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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SISKIYOU

Samantha Schlieter vs County of Siskiyou

Sarah Collard

March 02, 2026

Caroline F. Cansino, CSR No. 10488, Job No. 13271

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SISKIYOU

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SAMANTHA SCHLIETER, Plaintiff, VS. COUNTY OF SISKIYOU, SARAH COLLARD, SHANNON CLYMER, RICO GUTIERREZ, DANIEL BONHAM, and DOES 1 to 100, Defendants.	)	CASE NO.: 24CV12876

---oOo---

DEPOSITION

of SARAH COLLARD

Monday, March 2, 2026

10:00 a.m.

---oOo---

Reported by: Caroline F. Cansino, CSR No. 10488

APPEARANCES BY COUNSEL:

For the Plaintiff,:

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11520 San Vincente Boulevard
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BY: TANYA SMITH, SBN 290634

For the Defendants:

LIEBERT CASSIDY WHITMORE
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Sacramento, CA 95814
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BY: NATHAN JACKSON, ESQ.

Also present:

Shannon Clymer,
Siskiyou Co. Representative

For the Videographer:

Jeff Leland
High Touch

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BE IT REMEMBERED that under the applicable sections of the Code of Civil Procedure of the State of California 2025, Deposition of SARAH COLLARD, taken on behalf of plaintiff, on Monday, the 2nd day of March, 2026, commencing at the hour of 10:00 a.m., before me, Caroline F. Cansino, a Certified Shorthand Reporter in and for the plaintiff, Samantha Schlieter, was taken pursuant to notice.

SARAH COLLARD,

called as a witness by the defendant in the above-entitled action, whom, per Code of Civil Procedure section 2025.320, I placed under oath as the Certified Shorthand Reporter by virtue of Code of Civil Procedure section 2093(b), to tell the truth, the whole truth, and nothing but the truth, and who was examined and testified as follows:

10:00 **THE VIDEOGRAPHER: We are now on the record. The time is 10:00 o'clock a.m. Pacific standard time. The date is March 2, 2026.**

10:00 **This begins video session number 1 in the deposition of Sarah Collard in the matter of Samantha Schlieter versus County of Siskiyou, Sarah Collard, Shannon Clymer, Rico Gutierrez, Daniel Bonham, and DOES 1 through 100. This is venued in the superior court of the State of California for the county of Siskiyou County, the case**

10:01 1 number 24CV12876.
10:01 2 This deposition is being taken at 205 North Mount
10:01 3 Shasta Boulevard, Suite 400, Mt. Shasta, California, at
10:01 4 the request of Shegerian & Associates, 11520 San Vincente
10:01 5 Boulevard, Los Angeles, California 90049. Videographer
10:01 6 today is Jeff Leland of High Touch. Our court reporter
10:01 7 is Caroline Cansino, CSR number is 10488, also of High
10:02 8 Touch.
10:02 9 Will counsel and all parties please state their
10:02 10 appearances and whom they represent?
10:02 11 MS. SMITH: Good morning. My name is Tanya
10:02 12 Smith, and I represent the plaintiff Samantha
10:02 13 Schlieter.
10:02 14 MR. JACKSON: Nathan Jackson with Liebert
10:02 15 Cassidy Whitmore for the County of Siskiyou.
10:02 16 THE VIDEOGRAPHER: Will the court reporter
10:02 17 please swear in the witness?
10:02 18 THE COURT REPORTER: Good morning. My name is
10:02 19 Caroline Cansino, California Certified Shorthand Reporter
10:02 20 No. 10488.
10:02 21 This deposition will be stenographically reported
10:02 22 pursuant to Code of Civil Procedure section 2025.
10:02 23 Would you raise your right hand, please?
10:02 24 Do you solemnly state to tell the truth, the whole
10:02 25 truth, and nothing but the truth, so help you God?

10:02 1 MS. SMITH: Before you swear her in, the
10:02 2 county's representative is present.
10:02 3 MR. JACKSON: The county's representative,
10:02 4 Shannon Clymer, is present. Thank you.
10:03 5 THE WITNESS: I do.
10:03 6 THE COURT REPORTER: Thank you.
10:03 7 EXAMINATION
10:03 8 BY MS. SMITH:
10:03 9 Q. Good morning.
10:03 10 A. Good morning.
10:03 11 Q. My name is Tanya Smith. I am representing one
10:03 12 of Siskiyou County's former employees, Samantha
10:03 13 Schlieter.
10:03 14 Can you spell your full name for the record?
10:03 15 A. Sarah, S-A-R-A-H, C-O-L-L-A-R-D.
10:03 16 Q. Have you ever used any other names besides your
10:03 17 maiden name?
10:03 18 A. No.
10:03 19 Q. Are you employed by Siskiyou County?
10:03 20 A. Yes.
10:03 21 Q. How long have you been employed by Siskiyou
10:03 22 County?
10:03 23 A. Since August of 2000.
10:03 24 Q. What is your current job title with the county?
10:03 25 A. I am the health and human services director. I

10:03 1 also hold the title of behavioral health director.
10:04 2 Q. Did you say health and human services
10:04 3 administrator?
10:04 4 A. I'm the Health and Human Services Agency
10:04 5 director.
10:04 6 Q. Thank you.
10:04 7 As well as the behavioral health director?
10:04 8 A. Correct.
10:04 9 Q. Are you aware of the lawsuit filed by Samantha
10:04 10 Schlieter against Siskiyou County?
10:04 11 A. I am.
10:04 12 Q. Since we're speaking remotely without a judge
10:04 13 this may feel very informal today, but the testimony you
10:04 14 give is under the same oath you would need to swear under
10:04 15 if we were in court.
10:04 16 That means that the penalty of perjury that applies
10:04 17 in court also applies to your testimony today.
10:04 18 Do you understand that you must testimony truthfully
10:04 19 here just as you would if we were in court?
10:04 20 A. I do.
10:04 21 Q. The court reporter who administered the oath is
10:05 22 an officer of the court. Because you are now sworn in,
10:05 23 you are required to give your best, most accurate, and
10:05 24 most truthful responses to my questions.
10:05 25 Do you understand?

10:05 1 A. I do.
10:05 2 Q. If you answer a question, I will assume and act
10:05 3 as though you understood my question.
10:05 4 Will you agree to let me know if you did not
10:05 5 understand my question?
10:05 6 A. Yes.
10:05 7 Q. If you need me to repeat a question, will you
10:05 8 let me know?
10:05 9 A. Yes.
10:05 10 Q. If you need me to clarify a question, will you
10:05 11 let me know?
10:05 12 A. Yes.
10:05 13 Q. Because the court reporter can only record one
10:05 14 person's remarks at a time, it is necessary for you to
10:05 15 allow me to finish my question before you begin your
10:05 16 answer. Likewise, it is necessary for me to let you
10:05 17 finish your answer before I ask the next question.
10:06 18 Will you agree to not talk over me if I agree to not
10:06 19 talk over you?
10:06 20 A. Yes.
10:06 21 Q. I am entitled to your best estimate, but I
10:06 22 don't want you to guess. Do you understand the
10:06 23 difference between a guess and an estimate?
10:06 24 A. Yes.
10:06 25 Q. A guess would be you something you tell me

based on speculation. Like, if you told me the dimensions of my home kitchen table because you've never been to my home, since you don't have any personal experience with my kitchen, or my table in my kitchen, it would be a guess for you to tell me an answer.

But an estimate would be something you tell me based on your own observations and experiences. Like, if you told me the dimensions of your own kitchen table. You could estimate the dimensions based on your own knowledge, even though you have never measured your own kitchen table.

If you need to give an estimate during your testimony because you can't remember the exact answer, will you let me know you are giving me an estimate?

A. Yes.

Q. If you feel you can't give an exact recollection, you must still answer with the best recollection you have.

For example, if you don't recall the exact words used in a conversation, then I will ask you to give me the general substance of the conversation.

Do you understand?

A. I do.

Q. If I ask you about a conversation or an event and you remember some parts but don't remember the whole

thing, you are obligated to tell me everything you do remember when I ask about that conversation or event.

Does that make sense?

A. Yes.

Q. Therefore, it would be untruthful to tell me that you don't recall if you are able to give me some recollection of a conversation or an event.

Do you understand?

A. I do.

Q. Because our court reporter can't write down when you shake your head yes, or shake your head no, please use the words yes or no to answer a question, rather than nodding or shaking your head.

Okay?

A. Yes.

Q. The goal of today's deposition is to obtain your truthful and exact answers to the questions I ask.

If you remember more than your initial answer at any point today, please let me know that you would like to go back to an earlier question, so that we can have your complete testimony on the record.

Will you agree to let me know if you are adding more details to an earlier answer?

A. I do.

Q. After today's deposition is done, you will be

10:08 1 able to review your testimony in transcript form and make
10:09 2 corrections to it.
10:09 3 If you make any changes, I can bring the judge's
10:09 4 attention to those changes to compare with your original
10:09 5 transcript.
10:09 6 Do you understand?
10:09 7 A. Yes.
10:09 8 Q. Your testimony is being recorded by digital
10:09 9 video and audio. I can use the video and audio at trial
10:09 10 to show, not only your testimony, but your facial
10:09 11 expressions, body language, and anything else that might
10:09 12 be demonstrative.
10:09 13 Do you understand?
10:09 14 A. I do.
10:09 15 Q. If Mr. Jackson makes an objection after I have
10:09 16 asked you a question, you still need to answer the
10:09 17 question unless he tells you, I instruct you not to
10:09 18 answer the question.
10:09 19 Do you understand?
10:09 20 A. I do.
10:09 21 Q. Do you have any questions?
10:09 22 A. I don't.
10:10 23 Q. Is there anything about your physical, mental,
10:10 24 or emotional health today that would interfere with your
10:10 25 ability to give accurate answers?

10:10 1 A. No.
10:10 2 Q. Are you currently under the influence of any
10:10 3 drug, controlled substance, or under the influence of
10:10 4 alcohol, in a way that would impair your ability to give
10:10 5 me accurate answers?
10:10 6 A. No.
10:10 7 Q. When you were first hired by Siskiyou County in
10:10 8 2000, what was your job title?
10:10 9 A. I was a clinician. I was an intern. So I was
10:10 10 whatever class of clinician that was for interns.
10:11 11 Q. How long were you an intern?
10:11 12 A. I believe I received my license approximately
10:11 13 two years after I was hired.
10:11 14 Q. And what was your next job title after intern?
10:11 15 A. Psychologist.
10:11 16 Q. And how long were you a psychologist?
10:11 17 A. Until 2013.
10:11 18 Q. What was your next job title after
10:11 19 psychologist?
10:11 20 A. I was a supervisor for the children's system of
10:11 21 care.
10:11 22 Q. How long were you a supervisor for the
10:11 23 children's system of care?
10:11 24 A. It was a very short period of time, and I was
10:11 25 promoted to deputy director of behavioral health.

10:12 1 Q. So less than a year, do you estimate?
10:12 2 A. Yes.
10:12 3 I believe in 2013, I was the children's system of
10:12 4 care supervisor, the deputy director, and promoted to
10:12 5 director of the HIPAA health. All within that year.
10:12 6 But it may have been -- I believe it was within that
10:12 7 year. But it may have been that I was promoted to ASOC
10:12 8 as a supervisor in 2012. I can't recall exactly.
10:12 9 Q. After you were promoted to director of
10:12 10 behavioral health, how long did you stay in that
10:12 11 position?
10:12 12 A. April of 2018.
10:12 13 Q. What titles did you have after April of 2018?
10:12 14 A. Director of health and human health services.
10:13 15 I retained my behavioral health director title, as well.
10:13 16 Q. Have you had any other job titles since April
10:13 17 of 2018, besides director of health services and director
10:13 18 of behavioral health?
10:13 19 A. It is director of health and human services,
10:13 20 and no.
10:13 21 Q. Thank you.
10:13 22 A. You're welcome.
10:13 23 Q. Who is your current supervisor?
10:13 24 A. I have oversight from the board of supervisors
10:13 25 and from the county CAO, Angela Davis.

10:14 Q. What does CAO stand for?
10:14 A. County Administrative Officer.
10:14 Q. When you were the -- before you took your current job title as director of health and human services, did you have a supervisor?
10:14 A. Yes.
10:14 Q. Who was that person?
10:14 A. Terry Barber.
10:14 Q. Can you spell the name?
10:14 A. T-E-R-R-Y, B-A-R-B-E-R.
10:14 Q. If I needed to personally serve you with a trial subpoena, what address should I use?
10:15 MR. JACKSON: I will object. We will accept service for her since you sued her.
10:15 MS. SMITH: Will Mr. Jackson agree to produce Ms. Collard at trial subject to a Code of Civil Procedure section 1987 notice?
10:15 MR. JACKSON: We will.
10:15 BY MS. SMITH:
10:15 Q. What is your current phone number?
10:15 A. Personal or work?
10:15 Q. Work?
10:15 A. 530-841-4802.
10:15 Q. Do you intend to move from your current residence in the next year or two?

10:15 1 A. No.
10:15 2 Q. Have you answered questions under oath before,
10:15 3 like at a court hearing or another deposition?
10:15 4 A. Yes.
10:15 5 Q. When have you answered questions under oath
10:15 6 before?
10:16 7 A. I don't remember the exact year. It was during
10:16 8 my divorce proceedings.
10:16 9 Q. It wasn't an employment case?
10:16 10 A. No.
10:16 11 Q. Besides a family case, have you ever answered
10:16 12 questions under oath before?
10:16 13 A. No.
10:16 14 Q. Besides the family case, have you ever been
10:16 15 called as a witness in a trial or a hearing?
10:16 16 MR. JACKSON: Objection. It is overbroad.
10:16 17 BY MS. SMITH:
10:16 18 Q. Do you understand my question?
10:16 19 A. I understand the question.
10:16 20 Q. Okay.
10:16 21 And do you have an answer?
10:16 22 MR. JACKSON: Hold on.
10:16 23 Are you talking about any type of hearing, like an
10:16 24 administrative hearing within the county? That is what
10:16 25 my objection is. Hearing is vague. There are all sorts

of hearings but -- that the county may attend.

MS. SMITH: I'd like to know about them.

MR. JACKSON: Some of those could involve personnel matters that are not at all germane to this and not related to any employment matter, including child welfare cases that are restricted by law.

MS. SMITH: Obviously, I'm not going to -- this is a yes or no answer, Mr. Jackson.

MR. JACKSON: Well, I'm just making sure you're being clear with your question, and I find that overbroad.

BY MS. SMITH:

Q. If you understand my question, I would like an answer to it.

MR. JACKSON: So you are not instructed not to answer, but don't disclose anything that you are prohibited from disclosing.

THE WITNESS: No.

BY MS. SMITH:

Q. So typically you've not been called as a witness in a trial or a hearing.

Is that correct?

A. Correct.

Q. Have you been convicted of a felony?

A. No.

10:17 1 Q. Have you been convicted of any crime involving
10:17 2 dishonesty, such as theft or fraud?
10:17 3 A. No.
10:17 4 Q. Are you being represented by Mr. Jackson today?
10:17 5 A. I am.
10:17 6 Q. Do you understand that Mr. Jackson also
10:18 7 represents Siskiyou County?
10:18 8 A. I do.
10:18 9 Q. Did you prepare for your deposition in any way?
10:18 10 A. Yes.
10:18 11 Q. How did you prepare for your deposition?
10:18 12 A. I reviewed documents. I met with Mr. Jackson's
10:18 13 colleague, Charles Helstrom, and with Mr. Jackson.
10:18 14 Q. Can you describe the documents that you
10:18 15 reviewed?
10:18 16 A. The documents I produced for you and documents
10:18 17 that I was sent by Mr. Jackson.
10:18 18 Q. When you say the documents that you produced
10:18 19 for me is this --
10:18 20 Mr. Jackson, is this the link that Mr. Helstrom sent
10:18 21 last night?
10:18 22 MR. JACKSON: Yes.
10:19 23 BY MS. SMITH:
10:19 24 Q. Did you review any other documents to prepare
10:19 25 for your deposition, besides the items that the county

produced last night and documents that your attorney showed you?

A. The documents -- I've sent several sets of documents to you. I reviewed, I mean, because there are so many, right, I believe I reviewed all of those documents.

Q. Besides the documents you've produced last night through your attorney and the documents you've previously produced in this case, did you review any other documents to prepare?

A. No.

Q. Did you look for any documents after receiving your deposition notice?

A. No.

MR. JACKSON: Hold on.

Do you understand the question? Your deposition notice contains a request for documents.

THE WITNESS: Yes.

MR. JACKSON: So she's asking if you looked for documents after receiving that notice.

THE WITNESS: Did I look for documents?

MR. JACKSON: The documents that were produced.

THE WITNESS: Um --

MR. JACKSON: -- based off that notice.

THE WITNESS: Yes.

10:20 MR. JACKSON: So you can tell her you looked for documents based on the request.
10:20 THE WITNESS: Yes, I did look for all the documents based on the request.
10:20 BY MS. SMITH:
10:20 Q. When did you look for those documents?
10:20 A. Um, well, it took me a while. So since I received the request, I have been looking for those documents.
10:20 Q. And when did you receive the request?
10:20 A. I don't remember the exact date. I remember I went to Australia in the beginning of January and I received them prior to that, but I didn't have time to look for them until my return.
10:21 Q. Okay.
10:21 Did you communicate to anyone employed by Siskiyou County about your deposition today?
10:21 A. I communicated with my staff that I was in a deposition so they wouldn't wonder where I was.
10:21 Q. Anyone else?
10:21 A. My husband knows I'm in a deposition.
10:21 Q. Anyone else?
10:21 A. No.
10:21 Q. When you communicated with your staff about your deposition, what did you -- what did you tell your

staff?
A. That I'm in a deposition today. I won't be at work.
Q. Did you discuss anything more?
A. No.
Q. Did you communicate to anyone who does not work for the county about your deposition, besides your husband?
A. No.
Q. Did you communicate with Shannon Clymer about your deposition?
A. I have.
MR. JACKSON: You can answer. It is outside the presence of counsel.
THE WITNESS: Shannon knew I was in a deposition today.
BY MS. SMITH:
Q. I'm speaking of any communications you had with Ms. Clymer about your deposition, where Mr. Jackson or Mr. Helstrom were not part of that communication.
A. Shannon and I cover the office, so we communicated about office coverage.
Q. Besides office coverage, did you and Ms. Clymer discuss -- communicate about anything else with respect to your deposition?

10:22 A. With respect to my deposition, no.
10:22 Q. What is Ms. Clymer's title?
10:23 A. She's a deputy director of behavioral health.
10:23 Q. After Ms. Clymer attended Samantha Schlieter's deposition in December, did she discuss them with you?
10:23 A. No.
10:23 Q. Did you communicate with Aimee Von Tungeln about her deposition on Friday?
10:23 A. Initially when Mr. Jackson talked with me about communicating with Aimee --
10:23 MR. JACKSON: -- hold on.
10:23 You can't disclose our conversations.
10:23 THE WITNESS: Oh, sorry.
10:23 MR. JACKSON: I think you can pick it up from you contacted Aimee and asked.
10:23 THE WITNESS: I contacted Aimee and asked if it would be okay if I provided Mr. Jackson with her number because she no longer works for the county.
10:24 That was my communication with her.
10:24 BY MS. SMITH:
10:24 Q. Besides that conversation, did you an Ms. Von Tungeln discuss anything else with respect to your deposition?
10:24 A. No.
10:24 Q. Besides that conversation, did Ms. Von Tungeln

communicate with you regarding her deposition?
A. No.
Q. Have you communicated with Dan Bonham about your deposition?
A. No, he's probably aware that I'm in a deposition.
Q. Because he's one of your staff that is aware of the coverage?
A. Yes.
Q. Did you communicate with Rico Gutierrez about your deposition?
A. No.
Q. Did you supervise Samantha Schlieter during any of her county employment, either directly supervising her or indirectly supervising her?
A. I believe on the org chart during the time that she was the executive secretary that I was her direct supervisor. At that time I was located in a different building, and functionally Tracie Lima was her supervisor.
Q. And then after Samantha Schlieter left the position of executive secretary, were you no longer her direct supervisor?
A. Correct.
Q. At any point did you indirectly supervise

Samantha Schlieter after she left the position of executive secretary?

MR. JACKSON: Vague as to indirectly.

BY MS. SMITH:

Q. Do you understand my question?

A. Do I understand it, yes.

Q. Go ahead.

A. I had oversight of the MHSA program, but Tracie was her direct supervisor. So didn't directly supervise her or really indirectly supervise her. I oversaw the program but not directly.

Q. It was Tracie Lima who was her direct supervisor?

A. When she was the MHSA coordinator, correct.

Q. And so in your mind, this idea of indirect supervision, there was only direct supervision when Samantha Schlieter was the executive secretary. And in your mind, there was no indirect supervision after that point in time.

Is that correct?

A. That is correct.

Q. Besides Tracie Lima, are you aware of any other direct supervisors that Samantha Schlieter had when she was employed with the county?

A. Shannon Clymer was her direct supervisor when

she was working for adult supervision of care.

Shortly prior to her resignation, Christine Gannon was her supervisor when she worked for the children's system of care.

Q. Did she ever have any other direct supervisors that you are aware of?

A. No.

Q. I'm going to give you an exhibit to see if you are familiar with it.

MS. SMITH: Are we on 71?

THE COURT REPORTER: Let me check real quick. We are on 72.

(Exhibit 72 marked.)

BY MS. SMITH:

Q. Let me know after you've had a chance to look at Exhibit 72?

A. I need my glasses for this one. Excuse me.

Q. Are you familiar with this document?

A. Yes.

Q. It is an organizational chart for the Health and Human Services Agency as of September 18, 2023?

A. I believe so.

Q. And do you believe that this org chart is a true and connect copy of what the organization structure was of the Health and Human Services Agency as of

September 18, 2023?

A. I do.

Q. Do you know who created that document?

A. It is a joint effort between Kim Harper, who is the executive secretary for social services, and currently Chris Hargrove, who is the executive secretary for behavioral health, and probably Dawn Walton, who is the -- she's the administrator. I can't remember her title. She works for public, but all of -- the program manager.

All of the departments need to report. So I believe those are all the people that worked directly on it.

Q. And as of today currently, would your position have changed at all since the September 2023 time frame?

A. No.

Q. When Samantha Schlieter was employed by the county, was she four levels below you?

A. Well, as I said --

MR. JACKSON: Object as vague.

BY MS. SMITH:

Q. Do you have an idea of how many levels Samantha Schlieter was below you when she was employed by the county?

A. In which role?

Q. Oh, I apologize.

10:31 1 Her last role as behavioral health specialist.
10:31 2 A. One, two, three, four, yes.
10:31 3 Q. And she reported to Shannon Clymer, who
10:31 4 reported to Aimee Von Tungeln, who reported to Tracie
10:31 5 Lima, who reported to you.
10:31 6 Is that sequence correct?
10:31 7 A. Yes.
10:32 8 MS. SMITH: I'm going to give you Exhibit 72,
10:32 9 which is a close-up of the portion under Shannon Clymer.
10:32 10 THE COURT REPORTER: You want me to mark this as
10:32 11 73, right?
10:32 12 (Exhibit 73 marked.)
10:32 13 BY MS. SMITH:
10:32 14 Q. Are you ready to answer questions about Exhibit
10:32 15 73?
10:32 16 A. Yes.
10:32 17 Q. Um, since September of 2023, are any of these
10:32 18 individuals listed under Shannon Clymer still employed
10:32 19 with the county?
10:32 20 A. Dan Bonham, Theresa, Kim Romero, Jay Levie,
10:33 21 Amanda Mathie, M-A-T-H-I-E, Joseph Mott, Steven Stott,
10:33 22 Krystl Harkins, Mercedes Billingsley, and Elvia -- I'm
10:33 23 terrible at pronouncing her last name.
10:33 24 Q. A-M-E-Z-C-U-A?
10:33 25 A. Correct.

10:33 Q. Okay.
10:33 Was there anyone not listed on this organizational chart that was employed as someone reporting to Shannon Clymer in the September 2023 time frame?
10:33 A. I don't recall.
10:33 Q. Thank you.
10:33 Are you familiar with the behavioral health services full service partnership program?
10:34 A. I am.
10:34 Q. What is the full service partnership program?
10:34 A. It is a program for behavioral health clients that meet certainly eligibility criteria that provides additional benefits.
10:34 Q. Do you recall communicating with Samantha Schlieter about the full service partnership program when she was the executive assistant?
10:34 MR. JACKSON: Objection, overbroad.
10:34 BY MS. SMITH:
10:34 Q. Do you understand my question?
10:34 A. I do.
10:34 Q. And what is your answer?
10:34 A. I don't recall.
10:34 Q. Was her title when you were her direct supervisor executive assistant, or was it something different? I'm sorry.

10:35 A. I think it is executive secretary.
10:35 Q. So you don't know if you communicated with Samantha Schlieter about the full service partnership program when she was the executive secretary?
10:35 A. It is possible. I don't recall.
10:35 Q. And when Samantha Schlieter served as the mental health services act coordinator, did you communicate with Samantha regarding the full service partnership program?
10:35 A. Yes.
10:35 Q. Do you recall what you communicated with her regarding -- with respect to the full service partnership program?
10:35 A. When she was in that role, I probably had hundreds of communications with her about it. So specifically, no. But yes, I did absolutely communicate with her about that.
10:35 Q. Are you familiar with the behavioral health services prevention and early intervention program?
10:35 A. Yes.
10:35 Q. What is the prevention and early intervention program?
10:36 A. It is also an MHSA program that provides funding for prevention and early intervention services.
10:36 Q. When you use the term MHSA, are you referencing

10:36 1 the mental health services act?
10:36 2 A. Yes.
10:36 3 Q. Is this a state law?
10:36 4 A. Yes.
10:36 5 Q. What is your understanding of the purpose of
10:36 6 the mental health services act with respect to Siskiyou
10:36 7 County?
10:36 8 A. I think its original purpose was to expand
10:36 9 services to the mental health population and it brought
10:36 10 in services, as well. And that continues to be the
10:36 11 purpose.
10:36 12 Q. Did you communicate with Samantha Schlieter
10:36 13 regarding the prevention and early intervention program
10:37 14 when she was the mental health services act coordinator?
10:37 15 A. Yes.
10:37 16 Q. Do you remember any specific conversations or
10:37 17 communications you had with Samantha about the prevention
10:37 18 and early intervention program?
10:37 19 MR. JACKSON: Overbroad, vague.
10:37 20 BY MS. SMITH:
10:37 21 Q. Do you understand my question?
10:37 22 A. I do.
10:37 23 Q. And do you recall any specifics communications
10:37 24 about this program with Samantha?
10:37 25 A. I reviewed the emails, so I have some recall.

10:37 But again, I would have communicated with her probably
10:37 tens, if not hundreds of times, about that program.
10:37 Q. Are you familiar with the behavioral health
10:37 services annual revenue and expenditure reports?
10:37 A. I am.
10:37 Q. What agency from the state requests that
10:37 behavioral health services provide an annual revenue and
10:38 expenditure report?
10:38 A. The Department of Health Care Services or DHCS.
10:38 Q. Do you recall communicating with Samantha
10:38 Schlieter about the annual revenue and expenditure
10:38 reports being prepared for the Department of Health Care
10:38 Services?
10:38 A. Not specifically. That was a fiscal task.
10:38 Not -- it wasn't something that the MHSA coordinator
10:38 completed.
10:38 Q. When you say it was as a fiscal task, who at
10:38 fiscal are you thinking of?
10:38 A. I believe in this time frame you are
10:38 referencing it was Mimi Pierce. She was, I believe, she
10:38 was an administrative services specialist III. Rose
10:39 Bullock was the deputy director of fiscal at that time.
10:39 She oversaw that process.
10:39 I believe they worked on it together, but I believe
10:39 in that year Mimi completed the report.

10:39 Q. When you say in that year, what year are you thinking of?
10:39 A. The year that Samantha was the MHSA coordinator.
10:39 Q. Does 2022 sound about right?
10:39 A. Sounds about right. I can't be concern. It was either Rose or Mimi.
10:39 Q. What is your recollection of the annual revenue and expenditure report with respect to Rose or Mimi creating it, what happened after that?
10:39 A. It is submitted to DHCS.
10:39 Q. Do recall Samantha Schlieter having any involvement with the annual revenue and expenditure report when she was the mental health services act coordinator after it was created by Mimi Pierce or Rose Bullock?
10:40 A. After it was created, I don't imagine there was any communication, but I don't recall specifically. Again it is a fiscal task.
10:40 Q. Does the mental health services coordinator review the annual revenue and expenditure report before the county submits it to the Department of Health Care Services?
10:40 A. No.
10:40 Q. In your memory, you don't recall the mental

health services coordinator reviewing or verifying any of the numbers on the annual revenue and expenditure report before the county provided it to the Department of Health Care Services?

A. I believe there was some back and forth questions about numbers I saw in the emails, but there is no reason for her to review it prior to submission. She was not responsible for it.

Q. Because in your mind the person who is responsible for it would have been either Mimi Pierce or Rose Bullock.

Is that correct?

A. Rose Bullock and myself had ultimate responsibilities for it, but towards accuracy Rose Bullock had responsibility. But again Mimi may have worked on it that year. I believe she did.

Q. Did you communicate with Samantha Schlieter regarding any of her work complaints?

MR. JACKSON: Objection, vague.

BY MS. SMITH:

Q. Do you understand my question?

A. I do.

Q. And do you have a response?

A. Which complaints are you referring to?

Q. Are you aware of any work complaints that

Samantha Schlieter had?

A. Through this process I'm aware, no.

Q. And you don't recall communicating with Samantha Schlieter regarding any work complaints that you become aware of through this process of litigation?

A. I don't recall.

MR. JACKSON: I will object that it is vague. You can answer if you understand.

THE WITNESS: I don't recall.

BY MS. SMITH:

Q. What is your understanding of the work complaints that Samantha Schlieter has brought forward in this litigation?

MR. JACKSON: I will just caution -- you can answer to the extent that you understand what she's alleged.

THE WITNESS: Right.

I understand that she has alleged against me that I committed fraud with regard to the -- it is not clear to me because the way she complained. It is confusing. Either the ARER or through the annual update, she's accusing me -- excuse me. My mind just went blank.

MS. SMITH: That's okay. Take your time.

THE WITNESS: I know she has complaints against other employees, you know, in the -- oh, retaliation is

another complaint she has against me.

That they were inappropriate in the workplace. What are the other ones?

I'm just not remembering in the moment, but yeah.

BY MS. SMITH: That's okay.

Q. And your memory is that for the complaints that you become aware of during this litigation that you never had any communication about those complaints.

Is that correct?

A. Correct.

Q. Did any other current or former county employees communicate with you regarding any of the complaints that you become aware of through this litigation?

MR. JACKSON: Vague and overbroad.

BY MS. SMITH:

Q. Do you understand my question?

A. I understand it. Can you be more specific as to which complaint?

Q. Yeah.

Starting with the allegation of fraud, did any current or former county employee communicate with you regarding that allegation?

A. No.

Q. So that has never come up in terms of some sort

10:44 1 of investigation or inquiry or anything along those
10:44 2 lines.
10:44 3 Is that correct?
10:44 4 A. Outside of this?
10:44 5 Q. Correct.
10:44 6 A. Correct.
10:44 7 All behavioral health employees are required to sign
10:44 8 a document and it is departmental policy that they report
10:44 9 fraud to the compliance officer. There were no reports
10:45 10 concerning me.
10:45 11 Q. And with respect to the complaint of
10:45 12 retaliation that you become aware of during this
10:45 13 litigation, did any current or former county employee
10:45 14 communicate with you about that complaint of retaliation?
10:45 15 MR. JACKSON: Still vague.
10:45 16 BY MS. SMITH:
10:45 17 Q. Do you understand my question?
10:45 18 A. I do.
10:45 19 Q. And do you have a response?
10:45 20 A. No.
10:45 21 Q. The answer is that no county employee, current
10:45 22 or former, communicated with you regarding Samantha
10:45 23 Schlieter's allegations of retaliation?
10:45 24 A. Not that I recall.
10:45 25 Q. And with respect to coworkers behaving

10:45 1 inappropriately in the workplace, has any current or
10:45 2 county -- current or former county employee communicated
10:46 3 with you regarding that complaint made by Samantha?
10:46 4 A. Can you be more specific about which complaint?
10:46 5 Q. Um, there was a complaint about Rico Gutierrez
10:46 6 that is part of Samantha Schlieter's lawsuit.
10:46 7 Has any current or former county employee
10:46 8 communicated with you regarding her complaints related to
10:46 9 Rico Gutierrez?
10:46 10 A. I was aware of those complaints. I believe
10:46 11 both Tracie Lima and Aimee Von Tungeln spoke with me
10:46 12 about those complaints when they were filed.
10:46 13 Q. To your knowledge, was there more than one
10:46 14 complaint that Samantha made with respect to Rico
10:46 15 Gutierrez when she was employed with the county?
10:46 16 A. She made the complaint about the six-year-old
10:46 17 joke.
10:47 18 Q. And was there any other complaint that a former
10:47 19 or current county employee communicated to you about with
10:47 20 respect to Rico, besides that joke?
10:47 21 A. Tracie had a complaint that was addressed with
10:47 22 him about a comment he made to her.
10:47 23 Q. Was that the bitch comment?
10:47 24 A. No, separate.
10:47 25 Q. Tell me about the complaint you are aware of

that Tracie addressed with Rico?

MR. JACKSON: I'll just designate the testimony under the protective orders since it pertains to personnel information of Rico Gutierrez that we have produced in this case, and those records are designated confidential.

MS. SMITH: Yes.

THE WITNESS: I'm not sure what that means.

MR. JACKSON: It just means you can answer.

THE WITNESS: Oh, okay.

He made, and I don't recall specifically in the complaint, he made a comment about some buttons on a shirt that she was wearing.

BY MS. SMITH:

Q. Something along the lines that the buttons appeared to be nipples? Is that the complaint you are thinking of or you don't know?

A. I believe, and again I don't recall specifically, but there was something about being blinded by the buttons. I don't think he specifically said they were nipples or anything like that. I'm sure he didn't say that.

Q. That is not something you heard of?

A. No.

Q. Besides a possible buttons comment and a joke

10:48 about a six-year-old, were there any other complaints
10:48 that a current or a former county employee communicated
10:48 with you with respect to Rico Gutierrez that were about
10:48 Samantha?
10:48 A. The comment about that bitch wants my job.
10:49 That was investigated by personnel, but I'm aware of that
10:49 complaint.
10:49 Q. Okay. So besides these three items that we
10:49 have discussed, were there any other complaints that you
10:49 are aware of from an -- or communications made to you
10:49 from current or former county employees with respect to
10:49 Rico Gutierrez?
10:49 A. Not that I recall.
10:49 Q. And then with respect to Daniel Bonham, did you
10:49 have any communications with a current or former county
10:49 employee regarding any complaints Samantha Schlieter had
10:49 regarding Dan Bonham?
10:49 A. No.
10:49 Q. With respect to Shannon Clymer have you had any
10:49 communications with any current or former county
10:49 employees regarding any complaints Samantha Schlieter
10:50 made with respect to Shannon Clymer?
10:50 A. Outside of this?
10:50 Q. Outside of this litigation?
10:50 A. Is that the question?

10:50 Q. Yeah.
10:50 A. No, not that I recall.
10:50 Q. Are you aware of any other complaints that were alleged by Samantha Samantha besides the ones that we have discussed just now?
10:50 A. Not that I recall.
10:50 Q. Do you know Rico Gutierrez's current job title?
10:50 A. He's the homeless outreach worker. I'm not sure that is the exact title, but that is his role.
10:51 It is something like that. It wouldn't be on here.
10:51 Q. What was Rico Gutierrez's job title before he become the homeless outreach person?
10:51 A. Worker.
10:51 He was the project -- program coordinator. I also get project and program coordinator mixed up for children's system of care.
10:51 Q. And as the program coordinator for the children's system of care, did he report to Christine Gannon in this 2023 time frame?
10:51 A. Yes.
10:51 Q. Do you recall when Rico Gutierrez changed from the program coordinator position to the homeless outreach worker position?
10:51 A. I don't specifically recall, no. It has probably been 18 months or two years. I'm not sure. It

10:52 is an estimate.
10:52 Q. Do you know Dan Bonham's current job title?
10:52 A. Program coordinator.
10:52 Q. For the adult System of Care?
10:52 A. Correct.
10:52 Q. Do you know how long he's had that position?
10:52 A. Maybe four years. He's a II.
10:52 Q. Before this litigation, were you aware of any work complaints that Samantha Schlieter had with respect to you?
10:53 A. Can you be more specific? Any complaints that were filed with anybody?
10:53 MR. JACKSON: Object that the word complaint is vague.
10:53 THE WITNESS: Okay.
10:53 BY MS. SMITH:
10:53 Q. What is your understanding of the word complaint? Are you think of a formal process?
10:53 A. I'm asking.
10:53 Q. Oh.
10:53 A. If you're asking me about a formal process.
10:53 Q. In my mind, there are formal and informal complaints. But I don't want to be confusing, so maybe I'll just break it up between formal and informal.
10:53 Would that be helpful?

10:53 A. Sure.
10:53 Q. So with respect to formal complaints, are you aware of, before this litigation, any formal complaints that Samantha Schlieter made with respect to you?
10:53 A. No.
10:53 Q. And with respect to informal complaints before this litigation, were you aware of any informal complaints that Samantha Schlieter had with respect to you?
10:53 A. No.
10:53 MR. JACKSON: Object. Informal complaint is vague.
10:54 BY MS. SMITH:
10:54 Q. What is your understanding of the term informal complaint?
10:54 A. I think she had complaints about various things, like many people have complaints when I ask them to do things. You know, so I think she had those types of complaints.
10:54 Q. Run of the mill?
10:54 A. Run of the mill. I have to work late. I have too much work. I don't remember her specifically making those complaints, but it's possible.
10:54 Q. Before this litigation, were you aware that Samantha Schlieter suffered from depression during the

10:54 time she worked at the county.
10:54 A. No.
10:54 Q. Before this litigation, were you aware that
10:55 Samantha had anxiety during the time she worked with the
10:55 county?
10:55 A. No.
10:55 Q. Did you ever communicate regarding Samantha
10:55 Schlieter's depression at any point in time with anyone
10:55 employed by the county?
10:55 A. Outside of preparing for this litigation?
10:55 Q. Yes.
10:55 A. No.
10:55 Q. With respect to Samantha's anxiety, did you
10:55 communicate with anyone regarding that, anyone employed
10:55 by the county, regarding her anxiety at any point in
10:55 time?
10:55 MR. JACKSON: Assumes facts not in evidence.
10:55 You can answer it.
10:55 THE WITNESS: No.
10:56 BY MS. SMITH:
10:56 Q. Are you aware of any complaints against
10:56 Samantha Schlieter made by other county employees?
10:56 A. No, I don't recall any.
10:56 Q. Do you recall a complaint made my Krsytl
10:56 Harkins regarding Samantha Schlieter?

10:56 A. Oh, I thought you meant outside of this litigation. Yes.
10:56 Q. Maybe tell me what you mean by outside of this litigation because I may have something in my mind, but maybe it is not the same as you?
10:56 A. I am aware of the complaint that Krystl made as part of this -- well, I become aware of it shortly before Samantha went on leave.
10:56 Q. How did you become aware of the complaint Krystl Harkins made against Samantha?
10:57 A. Aimee Von Tungeln told me.
10:57 Q. And that was shortly before Samantha went on leave?
10:57 A. Correct.
10:57 Q. What did Aimee Von Tungeln communicate to you about the complaint from Krystl Harkins?
10:57 A. I don't recall specifically. The gist of it was that Samantha had been pursuing Krystl. Krystl was unhappy with that. Krystl had gone to personnel to complain about it, and that they were initiating an investigation.
10:57 Q. Did -- were you part of the decision-making process with respect to investigating Krystl's complaint against Samantha?
10:58 A. Can you clarify that question?

10:58 Q. It sounds like, at some point in time, the
10:58 county decided to investigate Krystl's complaint, and I'm
10:58 wondering if you had a role to investigate that complaint
10:58 against Samantha?
10:58 A. That was personnel's decision.
10:58 Q. When you say personnel, who are you thinking
10:58 of?
10:58 A. I believe it was Haley Hudson that was in that
10:58 position. That position changed, by the way, but it was
10:58 Haley at that time.
10:58 Q. Did you have any role with respect to
10:58 recommending or not recommending an investigation before
10:58 Haley Hudson made the decision to investigate?
10:58 A. I supported the decision. I don't think I made
10:58 a formal recommendation.
10:58 Q. Did Haley ask you if you supported the
10:58 decision?
10:58 A. I don't recall. I remember having a
10:58 conversation with her about it.
10:58 Q. What do you recall in your conversation with
10:59 Haley?
10:59 A. The conversation with Haley occurred after
10:59 Tracie made a comment to Krystl and we had a conversation
10:59 about the investigation, but I don't recall the details
10:59 of it.

10:59 Q. Was it before the decision to do the
10:59 investigation had been made, or after the decision to do
10:59 the investigation had been made.
10:59 Do you have a memory of the sequence?
10:59 MR. JACKSON: Calls for speculation.
10:59 BY MS. SMITH:
10:59 Q. Do you understand my question?
10:59 A. I do. What I recall is I don't work Fridays,
10:59 Aimee doesn't work Tuesday -- I mean Mondays. Aimee
10:59 didn't work Mondays.
10:59 I don't know the date at which Krystl had gone to
10:59 personnel to report the complaint. Aimee reported this
10:59 to me on a Tuesday when she came to work. I don't know
10:59 if a decision had been made prior to that Tuesday or not.
11:00 Q. Why did you support the decision to open an
11:00 investigation?
11:00 A. Based on what I knew at the time, the behavior
11:00 was egregious on -- Samantha's behavior was egregious.
11:00 As with everything, right, I want to ensure the safety of
11:00 our employees.
11:00 Q. When you say Samantha's behavior was egregious,
11:00 can you tell me what behavior it was that you thought was
11:00 egregious?
11:00 A. Pursuing Krystl at work over her -- my
11:00 understanding was her very straightforward lack of

11:00 1 interest in that, which she shared with Samantha.
11:00 2 Q. So the egregious behavior that you felt
11:01 3 supported opening an investigation was that Samantha was
11:01 4 pursuing Krystl, who had expressed no interest in any
11:01 5 consensual relationship.
11:01 6 Is that correct?
11:01 7 A. At that time that is what I knew of the case,
11:01 8 yes.
11:01 9 Q. Do you recall any other specifics with respect
11:01 10 to why you felt Samantha's behavior was egregious or what
11:01 11 specifically was egregious?
11:01 12 A. At that time that's what I recall.
11:01 13 THE VIDEOGRAPHER: Tanya, we're at an hour.
11:01 14 MS. SMITH: Let's take a break. Thank you.
11:01 15 THE VIDEOGRAPHER: This ends video session
11:01 16 number 1 of the deposition of Sarah Collard. Our time is
11:01 17 11:01. We are off the record.
11:11 18 (Recess taken.)
11:11 19 THE VIDEOGRAPHER: Okay. This begins video
11:11 20 session number 2 in the deposition of Sarah Collard. The
11:11 21 time is 11:11, and we are on the record.
11:11 22 BY MS. SMITH:
11:11 23 Q. Besides the investigation into Krystl Harkins's
11:12 24 complaint against Samantha Schlieter, are you aware of
11:12 25 any other investigations of Samantha by the county?

11:12 A. I am not aware of any.
11:12 Q. Are you aware of my medical leave that Samantha Schlieter took while she was employed with the county?
11:12 A. Subsequent to the complaint with Krystl, she took a leave. I am aware of that leave. I don't recall any others.
11:12 Q. What is your understanding of the leave that Samantha took after the complaint made by Krystl Harkins? Was it a medical leave to your understanding, or was it some other understanding?
11:12 A. To my understanding.
11:12 Q. Do you have any knowledge of the underlying medical basis for Samantha's leave?
11:12 A. My understanding is that the leave was based on a note that her therapist, Donna May, submitted to the county.
11:13 Q. Do you have any further insight at the time of Samantha's leave with respect to why Samantha's therapist wanted her to have a period of leave from work?
11:13 A. Further insight, no.
11:13 Q. And since Samantha has left the county, have you received any further information about why Samantha's therapist first submitted a note to have her placed on leave?
11:13 A. I'm not sure I understand the question.

11:13 Q. Oh, okay.
11:13 Besides your knowledge of Samantha's therapist providing a note for Samantha to take leave, do you have any other understanding as to why Samantha went on leave?
11:13 A. I don't think so. My understanding is she went on leave because of the note her therapist submitted. I don't understand. I don't have any information beyond that as to why she went on leave.
11:14 Q. No problem.
11:14 Besides the note that Samantha's therapist provided for her to go on leave, did you receive any other documents or emails regarding Samantha's leave?
11:14 A. I don't recall specifically. There have been so many documents related to this case that --
11:14 Q. Nothing is coming to mind?
11:14 A. Some of them -- I don't recall specifically, no.
11:14 Q. Were you aware that Samantha Schlieter applied for a student loan reimbursement program while she was a county employee?
11:14 A. I am.
11:14 Q. Did you have any communications with other county employees about her student loan reimbursement application?
11:15 A. There were -- there is a thread of emails,

Shannon communicated -- I can't remember if that email went to me and Tracie. Tracie and I had some communications, which is in an email.

Q. Besides those emails, did you have other communications with anyone with respect to Samantha's application for student loan reimbursement?

A. It is possible. I don't recall.

Q. Nothing stands out?

A. Nothing stands out.

Q. What is your understanding of the reason --

A. -- wait. Can I go back?

Q. Absolutely.

A. There was communication between myself and CalMHSA about everybody who applied, so I had those communications, but not anybody specifically.

Q. Can you tell me what CalMHSA stands for?

A. The California Mental health services Authority.

Q. What communications did you have with CalMHSA with respect to employees who applied for student loans reimbursement?

MR. JACKSON: You can answer that generally. Other than Samantha, don't identify a specific employee.

THE WITNESS: I won't.

So there is a whole application process. There was communication around enrollment periods, there was communication regarding eligibility, so there was over those years, there was probably hundreds -- well, I don't know if it was hundreds. Many, many, many, communications.

BY MS. SMITH:

Q. Do you recall your communications with CalMHSA with respect to Samantha's application?

A. Not specifically.

Q. Do you have an understanding as to the reason that Samantha was unable to receive student loan reimbursement while she worked for the county?

A. So what I recall is that Samantha applied as a test case because some employees who were applying reported that they had trouble with the portal in Cohort One and withdrew their application.

In Cohort Two she applied and was not awarded because there was a concern about the amount of funding we budgeted each year, and they pulled people off the list that I had said were eligible and awarded based on how those employees were ranked, right.

So the highest ranked employees -- and they went down that list until they ran out of funding for that particular round.

11:17 Q. When you say they --
11:17 A. -- CalMHSA.
11:17 Q. -- are you speaking of --
11:17 A. CalMHSA.
11:17 Q. CalMHSA.
11:17 So do you recall any other applications that Samantha made for the student loan program besides the one that was the test one that you just described and then the second one that was awarded based on seniority?
11:18 A. She applied a third time, but she left the county before she was awarded.
11:18 Q. Oh, okay.
11:18 Besides CalMHSA, did anyone else make decisions regarding the criteria that would be used to determine which county employees would receive student loan reimbursement?
11:18 A. Yes.
11:18 Tracie and I made those decisions. There are sort of two levels.
11:18 We made decisions about who should be eligible in collaboration with CalMHSA, and then -- yeah, yes.
11:18 Q. Besides Tracie Lima, did anyone besides you and Tracie Lima make decisions about which employees would be eligible for the student loan repayment program?
11:19 A. CalMHSA.

11:19 Q. And besides Tracie Lima, you, and CalMHSA, was there anyone else who made decisions with respect to county employees who would receive student loan repayment assistance?

A. That made decisions, no.

Q. What was the process by which an employee would receive their student loan funding after they applied?

Can you explain where you and Tracie fit into the process with CalMHSA?

A. Sure.

So CalMHSA administered the program. So at the county level we would open the recruitment period. CalMHSA would send us -- this is -- this is the recruitment period. County employees applied directly to CalMHSA. CalMHSA ranked those employees.

They sent me the list of employees, and I would let them know whether they were eligible or not. And then CalMHSA would take that list and their ranking and would award people based, you know, on how much money was available and the ranking.

In addition, there was a brochure that went out -- that was supposed to go out for each round, and so there was some communication about who was eligible between all of us. During that period we were short-staffed. I'm not sure how many of those we actually released, but that

was another kind of decision point.

Q. When you say you were not sure how many you released, is that you and Tracie Lima, or you and someone else?

A. The MHSA coordinator is part of that process. It was Samantha's responsibility to write that brochure, but it didn't get completed, that brochure.

Q. Did it ever get distributed out after Samantha began writing the brochure? Did someone else finish the brochure and distribute it?

A. No.

In all honesty, they wrote the brochure, they sent it to me for review. It was not -- it was not ready for release. I wrote them and said I'd work on it, but I ran out of time. I didn't have time, and they weren't able to get it to a form that I was comfortable with it being released.

So we did open the enrollment period but without the brochure.

Q. To your knowledge, did Samantha assist with the process in determining which criteria should be used to award employees with student loan reimbursement?

A. If you are asking was the decision -- was she part of the decision-making process, she was not the decision-maker, but she may have been involved in those

conversations. I'm not sure.

Q. There may have been a committee that met to discuss criteria?

A. It was really Tracie and me at that point.

Q. Okay.

A. Outside of CalMHSA.

Q. You don't have a memory of a committee of employees that included Samantha creating criteria for eligibility?

A. I don't have a memory of that, no.

Q. And when you and Tracie met to discuss the list that CalMHSA had provided to you, would you come up with a final list and then give it to CalMHSA, you and Tracie, and that is how the awards would happen?

Is that correct?

A. No.

Q. Oh.

What was the process?

A. It was much less -- I think formal than that for lots of different reasons.

I don't know that that information ever went back to CalMHSA, right. It was our responsibility to make those decisions outside of the program parameters.

Q. So once CalMHSA gave you the list, you and Tracie would determine which employees from that list

would receive the student loan reimbursement.

Is that correct?

A. Which were eligible.

Q. And then once you and Tracie determined which employees from CalMHSA list were eligible --

A. --- there are two different things. So I just want to be very specific.

Tracie would not receive the list once CalMHSA had ranked employees. I would receive that list and made that decision.

So in round one -- well, not in round one. That is the one that Samantha withdrew. In round two Samantha was awarded. I approved her to be awarded, and then they ran out of funds.

After that round, because it was over-subscribed, Tracie and I talked about eligibility criteria being kind of brought in because the overarching goal of that program was to develop the clinical workforce for behavioral health, right? Specifically clinicians because there were no clinicians. Clinicians were all going to, you know, online services.

So we talked about, and I made a decision at that point, to pull in eligibility criteria to specifically focus on that segment of the workforce.

In the next round Samantha and another case manager

and one nurse applied. So we were not over-subscribed. So I would have -- Samantha left. I approved the other case manager who was in the same position Samantha was and would have approved Samantha, but she left, and the nurse that applied.

So there are two different sort of points at which eligibility criteria was discussed. But I made final decisions about who was eligible. And I believe, although I can't be certain, that the only people that I -- through that program said were ineligible were people that left employment. And I believe there were two of those during that time. Everyone else I signed off on receiving the reward.

Q. The time frame in which you were changing the eligibility because the program, student loan repayment program, had been over-subscribed and too many people applied, do you remember what time frame that was?

A. It was after Cohort Two, so it was sometime around '21, '22, '23. I don't remember specifically.

Q. Do you recall ever telling Tracie Lima that you had changed the criteria in a way that would prevent Samantha Schlieter from being approved for a student loan repayment?

A. You have the email.

What I recall is that we talked about kind of

refocusing the program on that segment of the workforce, yes. But then that brochure never was written and because we weren't over-subscribed, people, you know, case managers were approved to receive student loan repayment.

But Samantha was gone by the time that happened. She was approved by me in Cohort Two or she wouldn't have received an award letter.

Q. So in your mind there was never a rejection of Samantha's student loan repayment program because you were unhappy with her as an employee or were unhappy with her complaining.

Is that correct?

A. Correct.

Q. Are you aware that Samantha applied for a position as behavioral health specialist in the mental health services act program while she was with the county?

A. I am.

Q. When did you become aware that she had applied for the position as behavioral health specialist in the mental health services act program?

A. I have no idea.

Q. What involvement, if any, did you have with respect to the county's decision not to hire Samantha for that particular position?

A. I don't recall any involvement, but it is possible. I'm involved in so many -- I have no idea.
Q. Do you recall telling Tracie Lima that Samantha should withdraw her application?
A. No.
Q. Do you recall telling any county employee that Samantha should withdraw an application for a position at the county?
A. No, I don't recall that.
Q. You never expressed to any county employee, current or former, that Samantha wasn't a good fit for a position that she had applied for?
A. I don't recall that -- saying that specifically. I think in that instance, it is possible, but I don't recall specifically.
Q. What do you recall about any comments you may have made with respect to Samantha not being a good fit for a position, or something along those lines?
A. I don't recall any comments. I can tell you what I think in retrospect.
MR. JACKSON: It's okay.
THE WITNESS: Samantha had worked for the schools. She had gone to work for the schools actually as an employee working under the MHSA grant at the schools. And --

11:30 Q. Sorry. Before you continue, can you tell me --
11:30 A. -- student services act.
11:30 And had had a falling out with the -- I don't know her role, Carla Truttman, who was overseeing that grant at the schools.
11:30 And then Samantha came back after that falling out. I don't know the details of it, but I had heard that it was a falling out.
11:30 And then applied for -- to be the case manager in that program. That program was a new program for us. We were very invested in making it work. It was are sort of a foundational program for our relationships with the schools, and that particular case management, case manager position, would work very closely with Carla.
11:31 And I felt it -- I mean, I feel now looking back, I don't remember having conversations then, but I think it is very possible I did. I felt like it would significantly impact the chances of success for that grant. So I don't think it would have been a good fit, and I would have -- I mean, I may have said that at the time. Looking back, I would definitely say that.
11:31 Q. And what is your understanding of the fallout that Samantha had with Carla?
11:31 A. I don't have details of that, but Samantha relayed that it was very problematic.

11:31 1 Q. Samantha told you that working with Carla --
11:32 2 A. -- I don't know if she told me specifically,
11:32 3 but I remember hearing that. I remember her telling
11:32 4 me -- well, I don't know.
11:32 5 Q. So you were concerned if Samantha was on the
11:32 6 county side and Carla was on the school side that
11:32 7 whatever difficulties they had previously, might carry
11:32 8 into the new position?
11:32 9 A. Yes.
11:32 10 Q. And so if your decision regarding -- if you
11:32 11 made a decision regarding Samantha not being placed in
11:32 12 this particular position, it was not due to some sort of
11:32 13 unhappiness with Samantha questioning you at work?
11:32 14 A. Absolutely not.
11:32 15 Q. What was the position that Samantha applied for
11:32 16 that would have liaised with Carla? Do you recall the
11:32 17 position title?
11:32 18 A. It was an MHSA behavioral health specialist.
11:33 19 I'm actually not sure. I believe that grant also had a
11:33 20 staff services analyst. I am not exactly sure, but
11:33 21 either of those positions would have been problematic
11:33 22 just in terms of our agency's relationship with the
11:33 23 schools.
11:33 24 Q. Have you signed any statements related to
11:33 25 Samantha's lawsuit?

11:33 A. Can you be more specific? I don't -- any statements?
Q. Sometimes people make what are called declarations, and they are like a statement that say what they recall of an event and then they sign it.
Have you done anything like that?
A. I don't believe so. I don't believe so.
Q. Have you emailed anyone that is not an attorney regarding Samantha Schlieter's lawsuit?
A. I may -- there may be emails with Haley Hudson regarding it. I know that I have was sent the initial paperwork from personnel, I believe, or from the court -- the court recorder. I'm not sure. So there may be something like that.
Q. But besides something informing you of the lawsuit, you don't recall any communications with anyone that is not a lawyer about Samantha's lawsuit?
A. Not that I recall, no.
Q. Do you currently have a job description?
A. For my position?
Q. Correct.
A. Yes.
Q. Has the county provided you the training due to either of your positions?
A. Yes.

11:34 I mean, I've been there a long time. Yes.
11:34 Q. Has the county provided you with training preventing workplace discrimination?
11:35 A. Yes.
11:35 Q. Do you recall when you received this training on preventing workplace discrimination?
11:35 A. I believe that that was part of the harassment training that they provide every two years. We also -- I required all staff to take an additional training, so there was that training, as well, in the last two years maybe.
11:35 Q. When you say there was an additional training besides workplace discrimination and workplace harassment, what is that additional training that you --
11:35 A. -- that is what it focused on.
11:35 Q. Workplace harassment and workplace discrimination?
11:35 A. Yes.
11:35 Q. Do you recall when you asked for that additional training or when the staff had that additional training?
11:35 A. It was in the past year, after I became aware of the issues that are related to this case, including Samantha's egregious behavior and very explicit sexual comments that she made at work and texts that she sent to

Krystl. All of those things I was very concerned in general and mandated that all staff attend an additional training.

Q. Did you also go to that training?

A. I did.

Q. And what comments did Samantha make to Krystl that you just referenced as part of your decision to require additional training for the staff?

A. I don't remember her specific comments, but what I recall is lots of very vulgar language, not just to Krystl, but in general. It is my understanding that there was very vulgar language in her communication to other members of staff and just in general in the workplace. Although I don't know specifically.

Q. Which staff did Samantha make vulgar comments to?

A. To Krystl and other staff.

Q. Besides Krystl you don't have any other names of staff that you believe Samantha made vulgar comments to?

A. My understanding is that they were pervasive, but I don't recall any other staff specifically.

Q. When you say pervasive, what does that mean to you?

A. That it was her common way of speaking.

11:37 Q. And do you recall what any of those vulgar comments were that you feel were pervasive?
11:37 A. I saw some of them in the documents I reviewed. You know, kind of, you know, all the ones -- do you want me to repeat them?
11:37 Q. Well, I'm just wondering what you were aware of when Samantha was an employee?
11:38 A. When she was an employee nothing.
11:38 Q. Oh, okay.
11:38 A. As a result of this lawsuit, I become aware of those types of comments that she was making.
11:38 Q. Was Samantha ever disciplined for making inappropriate comments at work?
11:38 A. Not to my knowledge.
11:38 Q. And before this lawsuit, had anyone complained about Samantha using vulgarity at work?
11:38 A. Not to my knowledge.
11:38 Q. Has the county provided you training on preventing retaliation?
11:38 A. Not as a standalone training, but as part of the harassment training.
11:38 Q. Have you ever used Microsoft Teams or other types of messaging platforms to communicate with other county employees?
11:39 A. I very rarely use Teams. The majority of

communication has been other employees to me.

Q. So other employees use Teams to communicate with you, and then how do you respond, in general, when you receive a Teams message; do you call the other employee or email?

A. I would say, in general, I never see the Teams message. It is just not how I communicate at work. There have been many complaints about that.

Q. What messaging platform do you use to communicate with county employee?

A. Just county email.

Q. Do you work use a work phone to text county employees?

A. I have a work phone. I very rarely use it to text. People typically text me on my personal phone, but it's just, I'm going to be late for work today. I don't have texting --

Q. Were you aware that Samantha, before Samantha left county employment, were you aware that she was bisexual?

A. No -- well --

Q. I'm sorry. Go ahead.

A. She went out on leave, and prior to her going out on leave, I become aware that she was pursuing Krystl. I'm not sure that that kind of defines her as

bisexual. But I was aware she was pursuing Krystl because her county employment terminated after some time, right, so she was on leave for a period of time.

So while she was still employed, I became aware that she was pursuing Krystl. But in my mind that doesn't necessarily make -- I mean, I don't know. People think about that differently. But prior to that, no.

Q. Besides an attorney, have you communicated with anyone about Samantha's claims that she refused to over-report the number of clients the county said they spent mental health services act funds on?

A. No.

MS. SMITH: I'm going to mark an eight-page document as Exhibit 74.

(Exhibit 74 marked.)

BY MS. SMITH:

Q. Are you ready for my question?

A. I am.

Q. Exhibit 74 is the first deposition notice that I served your attorneys with in October of 2025.

Before now did you receive this deposition notice that I sent to your attorney in October of 2025?

A. Yes.

Q. Is Exhibit 61 (sic) an accurate copy of the deposition notice that I sent to your attorney?

A. I believe so.
MS. SMITH: I'm going to mark this seven-page document as Exhibit 75.
(Exhibit 75 marked.)
BY MS. SMITH:
Q. There is another deposition notice that I sent to your attorney on November 18, 2025.
Before today did you receive this deposition notice that I sent your attorney in November of 2025?
A. Yes.
Q. Is it an accurate copy of another deposition notice my office sent to you in November of 2025?
A. I believe so.
MS. SMITH: I'm going to mark this seven-page document as Exhibit 76.
(Exhibit 76 marked.)
BY MS. SMITH:
Q. Exhibit 76 is another deposition notice that my office sent your attorney in late December 2025.
Before today did you receive this deposition notice that my office sent your attorney in late December 2025?
A. Yes.
Q. Is Exhibit 75 an accurate copy of another deposition notice my office served on your attorney?
A. I believe so.

11:45 1 MS. SMITH: I'm going to give the witness an
11:45 2 eight-page document marked as Exhibit 77.
11:46 3 (Exhibit 77 marked.)
11:46 4 BY MS. SMITH:
11:46 5 Q. Exhibit 77 is today's deposition notice, the
11:46 6 one that my office sent to your lawyer in early February.
11:46 7 Did you receive Exhibit 77 before today?
11:46 8 A. I did.
11:46 9 Q. And is Exhibit 77 an accurate copy of the
11:46 10 deposition notice for today?
11:46 11 A. I believe so.
11:46 12 Q. After you received this deposition notice, did
11:46 13 you go through the documents listed on pages -- the
11:46 14 documents requested on pages 2 through 7?
11:47 15 A. Yes.
11:47 16 Q. Did you find any documents as you were
11:47 17 searching for request number 1, which is at the bottom of
11:47 18 page 2?
11:47 19 A. Yes.
11:47 20 Q. And did your attorney produce those documents
11:47 21 as part of your -- did your attorney produce those
11:47 22 documents before last night? Did your attorney produce
11:47 23 those documents --
11:47 24 MR. JACKSON: I don't know if that is a fair
11:47 25 question to ask her.

11:47 MS. SMITH: Oh, okay.
11:47 MR. JACKSON: If the answer to that is yes, you can ask her what she found.
11:47 MS. SMITH: Maybe I'll do it that way.
11:47 Q. Do you recall what you located when you searched for documents for request number 1?
11:47 MR. JACKSON: That would correspond to the production log that we sent her.
11:47 THE WITNESS: Yes, there were many, many, many documents referencing full-service partnership.
11:48 BY MS. SMITH: Thank you.
11:48 Q. Moving on to the bottom of page 3, did you search for documents referencing the prevention and early intervention program?
11:48 A. I did.
11:48 Q. Did you find any documents?
11:48 A. Yes.
11:48 Q. And do you know if your attorney provided them to me?
11:48 A. He said he did.
11:48 MR. JACKSON: Yeah, you know --
11:48 THE WITNESS: I'm assuming he did. I don't know.
11:48 MR. JACKSON: Just for the record there was a link sent to opposing counsel with our production. Ms.

11:48 Collard was not on that link, so she'd not be able to
11:48 access specifically what we sent to opposing counsel.
11:48 MS. SMITH: I see, okay.
11:48 Q. Then for number 3, at the top of the page, did
11:48 you look for documents referencing an annual revenue and
11:48 expenditure report?
11:48 A. I did.
11:48 Q. Do you know if your attorney provided all of
11:49 the documents you located?
11:49 A. That is my understanding.
11:49 Q. Okay.
11:49 And then for number 4, did you locate any documents
11:49 regarding Samantha's complaints against Rico when you
11:49 were searching for documents?
11:49 A. I did.
11:49 Q. Do you know if your attorney provided the
11:49 documents you located?
11:49 A. I believe he did.
11:49 Q. Moving on to number 5, did you locate any
11:49 documents regarding Samantha's complaints relating to
11:49 Daniel Bonham when you were searching for documents?
11:49 A. Yes.
11:49 I searched back from the time she left employment
11:49 for any records and found none. So, no, I didn't provide
11:49 any.

11:49 Q. And then for number 6, did you search for any documents regarding Samantha's complaints against Shannon Clymer?
A. Yes.
Q. And did you find any documents?
A. No.
11:50 Q. And then moving on to number 7, did you look for any documents regarding Samantha's complaints against you?
A. Yes.
Q. Did you find any documents?
A. I found a document. I'm not sure it is a complaint, but I included it.
Q. What do you recall as the document that may not have been a complaint?
A. She emailed saying that it was her impression that I didn't like her, that she didn't know where she went wrong in our relationship, that she wanted kind of a redo.
Q. Okay.
And moving on to number 8, did you search for documents regarding Samantha's anxiety when you were searching for documents?
A. Yes.
Q. Did you locate any documents?

11:51 MR. JACKSON: Excluding any with counsel.
11:51 MS. SMITH: Correct.
11:51 THE WITNESS: I believe there are emails regarding her request for leave from Becky Sloan. There was, um, I believe a document she submitted. I don't remember specifically. But yes, there were responsive documents.
11:51 Q. Okay.
11:51 And then did you search for any documents regarding Samantha's depression?
11:51 A. Yes, I didn't find anything. I mean, it would all be are part of that same. I think they were all linked in the documents that I have.
11:51 Q. Okay.
11:51 Depression and anxiety together?
11:51 A. Uh-huh.
11:51 Q. And to your knowledge, your attorney provided those?
11:51 A. To my knowledge.
11:51 Q. Moving on to number 9, did you search for any documents regarding complaints against Samantha?
11:52 A. Yes.
11:52 Q. And did you find any documents?
11:52 A. I don't believe so. I mean, outside of this issue, I don't remember if I submitted documents

pertaining to this issue. I don't know if I had any actually, other than, you know --

Q. When you say this issue, tell me what you mean by that?

A. This lawsuit.

Q. Oh.

So other than the lawsuit that Samantha filed, you didn't find any documents --

A. -- I don't believe so, yeah.

Q. And then moving on to number 10, did you search for documents regarding any investigation of Samantha?

A. Yes, I did a search for all of these. There were so many things I submitted to you, I can't remember anything specifically pertaining to this investigation.

Q. So that is your answer for each one, if you found something you gave it to your lawyer.

Is that correct?

A. Correct.

Q. If we can skip over to number 16 on page 6, you haven't signed any declarations or affidavits regarding this lawsuit.

Is that correct?

A. I don't believe so.

Q. And so there was nothing that you produced on number 16.

Is that correct?
A. Uh-huh.
Q. Is that a yes?
A. That's a yes.
Q. And then skipping down to number 19, did you locate documents regarding your training after looking at this notice?
A. Yes.
Q. And did you provided that to your attorney?
MR. JACKSON: Those will be provided to you at a later -- this afternoon, as well as for Aimee Von Tungeln, but under the parties' protective order.
THE WITNESS: I provided some, and I believe personnel provided you with some.
MR. JACKSON: You don't want to say what other people provided.
We'll be providing you with certificates.
BY MS. SMITH: That's fine.
Q. For number 2 did you search through your emails and texts as part of the process or preparing for today?
A. I searched through texts, I'm not absolutely certain that I searched through Teams because I don't use it, yes.
Q. Did you find any texts that related to Samantha's allegation of the discrimination or

harassment?

A. Texts, no.

Q. And then when you were searching texts for number 21, did you find any texts relating to Samantha's allegation of retaliation?

A. No.

Q. And then for number 22, did you find any complaints, except for the one that you weren't sure was a complaint, that Samantha made to you?

A. About me?

Q. Uh-huh.

A. No.

Q. And I'm done with 76. No, this is 77. We're done with 77.

How would you characterize your work relationship with Samantha when she was the executive secretary?

A. For the majority of that time, I worked in a different building. So I worked at 818, what is the social services building, 818 S. Main, so I didn't have much of a relationship. She assisted behavioral health, taking minutes, organizing minutes, she -- that was her main function in that role. For me, I don't really rely much on my secretary, and there is an executive secretary that works at 818 that did my travel.

It is possible that Samantha may have assisted with

some of my travel during that time.

Q. Do you recall any negative events from the time that you interacted with Samantha when she was executive secretary?

MR. JACKSON: It is vague and overbroad because negative events and interactions with Samantha, any negatives of any aspect of Ms. Collard's life is not limited to Samantha's actions.

MS. SMITH: I'm so sorry. I'm not trying to get into your personal life.

Q. With respect to your interactions with Samantha when she was executive secretary, do you recall any negative events relating to Samantha?

A. Could you be a little more specific? Like --

Q. Do you recall any problems that you had with her when she was an employee?

A. I don't recall any.

Q. And do you recall any concerns about her work when she was executive secretary?

A. I don't recall any. But again, I didn't really have a ton of interaction with her.

Q. When Samantha become the mental health services act coordinate, how would you characterize your work relationship with her during that time frame?

A. I'd say it was somewhat more challenging.

11:58 1 Q. What made it challenging?
11:58 2 A. It was my impression that she didn't have a
11:58 3 sound understanding of the program in general, and so
11:58 4 there were situations that came up where she wanted to
11:58 5 change things that were, you know, in a statute.
11:58 6 She wrote an MHSA plan and it was very poorly
11:58 7 written. I had to rewrite the entire thing.
11:58 8 Q. Anything else that made it challenging?
11:59 9 A. I don't recall anything specific, but in
11:59 10 general, I just don't think she had a sound understanding
11:59 11 of the program.
11:59 12 Q. What training do you recall Samantha receiving
11:59 13 when she become the mental health services act
11:59 14 coordinator?
11:59 15 A. Tracie was her supervisor and Tracie provided
11:59 16 the training.
11:59 17 Q. Besides Tracie Lima, are you aware of any other
11:59 18 training that Samantha received as a mental health
11:59 19 services act coordinator?
11:59 20 A. I don't recall. We, you know, make training
11:59 21 available to staff when we can. It was shortly after
11:59 22 COVID, so there wasn't very much training available
11:59 23 during that time just because of the COVID situation.
12:00 24 So there may have been online training that she
12:00 25 attended. I'm not sure.

12:00 1 Q. What sorts of things was Samantha trying to
12:00 2 change that you thought were not allowed by the statute?
12:00 3 A. The MHSA funds, the various components, are
12:00 4 based upon a percentage. For instance, the PEI component
12:00 5 received 19 percent of MHSA allocations received by each
12:00 6 county.
12:00 7 In the year that she was working on the plan, those
12:00 8 were very -- MHSA, it is funded by tax on millionaires,
12:00 9 and through the COVID years -- and it is in arrears. We
12:00 10 receive funding in arrears when there is true-up. So two
12:01 11 years after there is a true-up, so it is a very volatile
12:01 12 funding source.
12:01 13 And so the year prior we had funded our PEI
12:01 14 providers, we subcontract out the majority of the
12:01 15 prevention and early intervention funding, and so we had
12:01 16 funded them at a level based on the revenue we had in
12:01 17 that particular year.
12:01 18 In the year where Samantha was working on plan, we
12:01 19 had less funding. And so she wanted to change -- she
12:01 20 wanted to give them more than 19 percent, which is set in
12:01 21 statute. You cannot just decide you want to provide, you
12:01 22 know, a higher percentage of that funding to another
12:01 23 component. So that is an example.
12:01 24 There is an email that references that somewhere in
12:01 25 there.

12:01 1 Q. Are there any other examples of things that
12:01 2 Samantha wanted to change that you felt were not allowed
12:02 3 by statute?
12:02 4 A. I don't recall any off the top of my head.
12:02 5 Q. When you say not allowed by the statute, can
12:02 6 you tell me what statute you are referring to?
12:02 7 A. I'm not going to recall the specific ones. I
12:02 8 can -- it is in regulations. MHSA, you can look it up,
12:02 9 it is in regulations.
12:02 10 Q. In the Welfare & Institutions Code? Is that
12:02 11 what you're --
12:02 12 A. There are different pieces in different places,
12:02 13 so I'm not sure. I don't know specifically.
12:02 14 Q. Okay.
12:02 15 A. I can certainly provide it.
12:02 16 Q. No, that's okay.
12:02 17 What is your understanding of the documents that the
12:02 18 county is required to provide to the state each fiscal
12:02 19 year under the mental health services act?
12:02 20 A. So it depends on the year. There is a
12:03 21 three-year plan that is written every three years
12:03 22 obviously. In the two subsequent years there is an
12:03 23 annual update, and on a different cadence where -- oh,
12:03 24 there is a report for the PEI program that is sort of a
12:03 25 standalone, and on a different cadence the annual revenue

and expense report, you know, we submit that.

There are the documents and reports. I think those are the main ones. I may be forgetting something.

Q. Going back to your belief that Samantha didn't have a sound understanding of the mental health services act program, is there anything that you can recall documenting about at that time?

A. I had conversations with Tracie about my concerns. I don't -- I don't, you know, based on my review of the documents for this case, I didn't see anything in there. It is possible there is something. I'm not sure.

I reviewed every single email, but I had conversations with Tracie about my concerns.

Q. What do you recall of those conversations?

A. Just that they were general conversations about -- I also moved back to that building from 818 because I was concerned about that -- I was concerned about several things, but one of them was the MHSA program.

And I was concerned that it was not being implemented appropriately. So I came back to provide additional support and guidance to Tracie and Samantha.

Q. Did you document at the time that part of the reason for moving physically closer to Samantha was

12:04 because --
12:04 A. -- no. --
12:04 Q. -- you thought she didn't have a strong understanding of MHSA?
12:04 A. No, and that was like I said, that is only one reason. That was one certain concern I had.
12:05 Q. But you didn't document it?
12:05 A. To my knowledge, that is correct.
12:05 Q. I know we need to break.
12:05 THE VIDEOGRAPHER: You have about eight more minutes before we hit an hour.
12:05 MS. SMITH: Then I'm going to keep going.
12:05 THE VIDEOGRAPHER: Yeah, keep going.
12:05 MS. SMITH: I'm going go give you Exhibit 78.
12:06 (Exhibit 78 marked.)
12:06 BY MS. SMITH:
12:06 Q. Are you familiar with this four-page document that is marked as Exhibit 78?
12:06 A. I don't know if I've ever seen this specific document.
12:06 Q. You're not aware that it was stored on the team MHSA service folder?
12:06 A. No, but I'm sure it was. If you say it was --
12:06 MR. JACKSON: -- don't.
12:06 THE WITNESS: Sorry.

12:06 BY MS. SMITH:
12:06 Q. I just want to know what you recall. If you don't agree with me, that's okay.
12:06 A. I don't recall ever seeing this report.
12:06 Q. Do you know who created this particular document -- no, because you've never seen it.
12:07 A. No.
12:07 Q. As you look through Exhibit 78, is there anything that appears inaccurate about its summary of the mental health services act based on your knowledge of the report you were describing to me earlier?
12:07 MR. JACKSON: Lacks foundation, overbroad.
12:07 BY MS. SMITH:
12:07 Q. Does this document appear accurate with respect to how it summarizes the reporting required under the mental health services act?
12:07 MR. JACKSON: Same objections.
12:08 BY MS. SMITH:
12:08 Q. Did you understand my question?
12:08 A. I did.
12:08 Q. What is your response?
12:08 A. It appears accurate.
12:08 Q. Is there anything that seems off, or that you would question as you look at it?
12:08 MR. JACKSON: Have you read the whole thing?

12:08 THE WITNESS: No.
Do you want me to read the whole thing?
MR. JACKSON: We can go off record if you want.
MS. SMITH: Yeah, that's all right.
THE VIDEOGRAPHER: You want to go off?
MR. JACKSON: Might as well. It is going to take a minute to read it.
THE VIDEOGRAPHER: This ends video session number 2 in the deposition of Sarah Collard. The time is 12:08, and we are off the record.
12:19 (Recess taken.)
THE VIDEOGRAPHER: Okay. This begins video session number 3 in the deposition of Sarah Collard. The time is 12:19, and we are on the record.
BY MS. SMITH:
Q. All right.
Now that you've had a chance to look at Exhibit 78, is there anything in Exhibit 78 that you disagree with or that seems inaccurate to you?
A. That seems inaccurate, no.
Q. When you look at page 1 of Exhibit 78, do you see the section at the top that says annual report?
A. Yes.
Q. Do you agree that the county is required to

provide an annual revenue and expenditure report?
A. Yes.
Q. That is different from the annual report, or is that the same thing?
A. I think that like we refer to it as the ARER or the RER, but no, they are the same thing.
Q. Can you tell me with were ARER or the RER?
A. Annual revenue and expenditure report.
Q. And if you go six bullet points down on annual report, is one of the portions required in this report and report on the prevention and early intervention program?
A. I think online I did see it as the 4th bullet point down. Oh, but you're counting the two above, yes.
Q. So there is some kind of a worksheet that prints out on PEI, or the prevention and early intervention program.
Is that correct?
A. That's correct.
MR. JACKSON: I'm going to object to the extent that you are asking the witness legal conclusion questions, which are designed to confirm or interpret a statute versus some other requirement.
BY MS. SMITH:
Q. And then going to page 2, do you see the third

session that talks about client services reporting, it is the third sections down on page 2?

A. I see it, yes.

Q. Do you agree that the county is required to report how many clients it has served using funds from the mental health services act?

MR. JACKSON: Objection to the extent it is calling for a legal conclusion. There is not an authenticated document.

You can answer.

THE WITNESS: Can you please repeat the question?

BY MS. SMITH:

Q. So looking at the third section under client services reporting and information system data, do you agree that the county is required to report how many clients it serves using funds from the mental health services act?

A. Yes.

MR. JACKSON: Same objection.

THE WITNESS: Yes.

BY MS. SMITH:

Q. Do you agree that the county is required to submit and update the three-year plan to receive funds under the mental health services act?

12:22 A. Yes.
12:22 Q. Okay.
12:23 MS. SMITH: I'm going to give the witness a four-page document that we'll mark as 79.
12:25 (Exhibit 79 marked.)
12:25 BY MS. SMITH:
12:25 Q. Have you seen Exhibit 79 before?
12:25 A. Nope.
12:25 Q. Is there anything about Exhibit 79 that seems inaccurate to you?
12:25 MR. JACKSON: Lacks foundation that she would have knowledge to answer this question. Calls for speculation. I raise the same objections to Exhibit 78.
12:25 BY MS. SMITH:
12:25 Q. Would you like me to repeat my question?
12:25 A. I oversee this program, but as I noted earlier from several steps away, so I can't say specifically. I know the program in a broad sense.
12:25 Q. So you don't feel comfortable telling me whether Exhibit 79 is accurate, is that correct?
12:25 A. As to this level of detail, I can't say.
12:26 Q. Do you agree that the county is required to submit a three-year plan expenditure to show compliance to the Department of Health Care Services?
12:26 A. Yes.

12:26 Q. Do you agree the county is required to update the three-year plan annually?
12:26 A. Yes.
12:26 MR. JACKSON: I object. These are calling for legal conclusions versus her understanding of some other requirement.
12:26 MS. SMITH: I'm going to give Ms. Collard a 61-page document that we will mark as 80.
12:27 (Exhibit 80 marked.)
12:27 BY MS. SMITH:
12:27 Q. I'll begin with asking you specifically about page 79, but take your time to look through the document.
12:27 Are you ready?
12:28 A. I am.
12:28 Q. Okay.
12:28 Are you familiar with Exhibit 80?
12:28 A. Yes.
12:28 Q. Is it the annual update for fiscal year 2022 to 2023?
12:28 MR. JACKSON: I'll object that the witness has not looked through the entire document.
12:28 BY MS. SMITH:
12:28 Q. Oh, take your time before I continue on?
12:28 A. I also noted that on the signature page, there aren't any signatures.

12:28 Q. Yeah.
12:28 A. I can't say. I submitted the one with signatures.
12:28 Q. Okay.
12:28 A. So I can't say for sure.
12:28 Q. Do you need more time to review Exhibit 80?
12:28 A. Shall I read the entire thing right now? I wrote it.
12:28 MR. JACKSON: I mean, if you wrote it and if you feel comfortable answering her questions, you can answer them.
12:28 THE WITNESS: I don't know what the questions are yet, but yes.
12:28 MR. JACKSON: I would go page by page if you're not going to review the whole thing. She's asking you to confirm if this is a true and correct copy.
12:29 THE WITNESS: I'm saying I can't confirm it because I'm not certain.
12:29 BY MS. SMITH:
12:29 Q. Okay.
12:29 Do you believe that this is an unsigned version of the annual update from 2022 to 2023?
12:29 A. It appears to be.
12:29 Q. Do you recall working with Samantha Schlieter on this particular annual update before you submitted it?

12:29 1 A. With her, no.
12:29 2 Q. What do you recall Samantha's Schlieter's
12:29 3 involvement was with regard to this fiscal update from
12:29 4 2022 to 2023?
12:29 5 A. She and Tracie worked to a draft, which they
12:29 6 submitted to me. As I mentioned earlier, I was concerned
12:30 7 about the quality of it, so I rewrote it. I assume there
12:30 8 was some back and forth during that process, but I don't
12:30 9 remember specifically working with her on it.
12:30 10 Q. Your memory is that you and Samantha did not
12:30 11 cowrite Exhibit 80, but you rewrote Exhibit 80.
12:30 12 Is that correct?
12:30 13 A. She wrote a draft and I rewrote it. So there
12:30 14 are sections in there that I am sure I just pulled
12:30 15 forward. Some of them pull -- some portions of the plan
12:30 16 pull forward year to year, right, like the description of
12:30 17 the county, other than population, doesn't change. So
12:30 18 that kind of thing is pulled forward and that would have
12:30 19 come from her draft. So there are some portions that are
12:30 20 I'm sure identical to her draft and portions I rewrote
12:31 21 completely.
12:31 22 Q. Do you remember providing to the county the
12:31 23 draft and then the final version?
12:31 24 A. To the county?
12:31 25 A. Or to your county lawyer? Sorry.

MR. JACKSON: You can't talk about anything given to us, that would be privileged communication.

BY MS. SMITH:

Q. Do you know if Mr. Jackson has produced the draft at that point, the final version of the annual report of 2022 to 2023?

A. I don't know if he's produced it. I sent it to them, the draft, and obviously this was in there, but I believe there was a signed copy in there, as well.

MR. JACKSON: You have those.

BY MS. SMITH: Okay, thank you.

Q. And do you think that you worked on this particular annual update in the spring of 2022?

Does that sound correct?

A. It sounds correct. It might have been summer, right, the draft was due July 1, by July 1, before July 1, and we were late submitting it because of the rewrite.

Q. Does the county board of supervisors approve this annual update in the September 2022 time frame?

A. I believe it was approved in September, but I can't say for certain.

Q. Okay.

If you flip over to page 7, you noted that there is no actual signature at the bottom of page 7 underneath your name.

12:32 Is that accurate?
12:32 A. That is accurate.
12:32 Q. Do you know why this particular version doesn't have a signature, but you recall signing a copy of one before it went to the state?
12:33 A. So when I did my search for you, I searched for all responsive documents. So I am sure there are many, many, many drafts in there. So you received many drafts.
12:33 Q. Okay, no worries.
12:33 So this is probably just a draft before it was finalized --
12:33 A. -- yes.
12:33 Q. -- and submitted. Okay, got it.
12:33 When you signed the 2023 to 2023 annual update, were you certifying to the state that the information in it was true and accurate?
12:33 A. I was.
12:33 Q. Do you recall Samantha Schlieter telling you that she was not signing this 2023 to 2023 annual update?
12:33 A. I don't. But there is no -- there is no role for her in signing, so I don't -- that doesn't even make sense. But I don't recall that, no.
12:34 Q. Okay.
12:34 Did the mental health services act coordinator sign the annual updates before September of 2022?

12:34 A. No.
12:34 Q. Who signed the annual updates?
12:34 A. The auditor and myself.
12:34 Q. When you say the auditor, are you referring to a specific person?
12:34 A. Yes, Diane Olson is the current auditor. Jennifer Taylor was the previous auditor. So it depends on the year.
12:34 Q. You don't recall an employee named Tammy Wrightmeyer signing the annual updates when she was the mental health services act coordinator?
12:34 A. I don't recall that. I guess it is possible, but it specifically asks for the mental health director.
12:35 Q. If you could turn to page 17. Do you see the heading fiscal year 20 slash 21 outcomes at the top of page 17?
12:35 A. I do.
12:35 Q. It says the first sentence discusses the full service partnership program that we briefly discussed earlier today?
12:35 A. It does.
12:35 Q. Does the first sentence indicate that 268 clients received services in fiscal year 2022 to 2021?
12:35 A. It does.
12:35 MR. JACKSON: I object. The document speaks

for itself.

BY MS. SMITH:

Q. Do you see that the number 206 appears at the top of page 17?

A. I do.

Q. Do you recall telling Samantha to put 206 as the number of clients who participated in the county's full service partnership program in fiscal year 2022 to 2021?

MR. JACKSON: Assumes facts not in evidence, lacks foundation as to this exhibit, which has not been authenticated by the witness.

BY MS. SMITH:

Q. Did you understand the question?

A. Do I recall telling her that, no.

Q. Do you recall any conversation about the number of clients who participated in the full service partnership program when you were working on this document?

A. Specific conversations, no.

Q. You don't recall any disagreement as to the correct number of clients who participated in the county's full service partnership program?

A. Specifically, no.

Q. Were you the one that determined that the

12:37 number of clients who received full service partnership
12:37 services was 206?
12:37 MR. JACKSON: Same objection as earlier, lacks
12:37 foundation, assumes facts not in evidence, not an
12:37 authenticated exhibit.
12:37 BY MS. SMITH:
12:37 Q. Did you understand my question?
12:37 A. I did, but could you please repeat it?
12:37 Q. Sure.
12:37 Were you the one that determined that the number of
12:37 clients who received full service partnership services
12:37 was 206 in fiscal year 2020 to 2021?
12:37 A. No.
12:37 Q. Do you know who determines that?
12:37 MR. JACKSON: Same objections.
12:37 BY MS. SMITH:
12:37 Q. Did you understand my question?
12:37 A. I did.
12:38 So I can't say for certain. In general, our fiscal
12:38 team would. Because you see on these former exhibits, it
12:38 refers to CSI data, which is data out of our billing
12:38 record. So out of our electronic health record, and so I
12:38 don't know how to pull those records. So our fiscal team
12:38 would pull the CSI data from the electronic health record
12:38 and provide me with the numbers. So I didn't determine.

12:38 It was just our billing information.
12:38 We had, and I don't remember specifically the dates, a project coordinator that would sometimes pull data from the record, the same data, the billing data at CSI. So I can't stay whether it was fiscal. I will say with certainty that I rely on fiscal's numbers because they are responsible for billing and any audit would tie back to the CSI.
12:39 Q. When you reference the coordinator, did you -- do you have a specific person in mind?
12:39 A. Tara Ames was the project coordinator.
12:39 Q. And when you reference fiscal, do you have a specific person in mind?
12:39 A. Rose Bullock.
12:39 Q. So you believe that the 206 number came from either Rose Bullock or Tara Ames using the electronic health record system.
12:39 Is that correct?
12:39 MR. JACKSON: Again lacks foundation as to the number, calls for speculation, not authenticated.
12:39 BY MS. SMITH:
12:39 Q. Did you understand my question?
12:39 A. Could you repeat it just to make sure I'm answering it accurately?
12:40 Q. Of course.

So this number that is at the top of page 17, 206, you think it came from Rose Bullock or Tara Ames using the electronic health records.

Is that correct?

MR. JACKSON: Same objections.

THE WITNESS: So that was the general -- that was how I determined numbers. If you look at the draft that Samantha submitted to me, I pulled these numbers from that draft.

There is a typo in my draft, which is embarrassing, it should be 124 adults not 24 adults, but these numbers are the numbers that I pulled over from the -- from the draft that she provided me.

Q. Do you recall Samantha telling you that the number of clients served under the county's full service partnership program was actually 106?

A. I don't recall that, no.

Q. Do you recall Samantha telling you how she knew that 206 was not accurate?

MR. JACKSON: Same objections as earlier.

THE WITNESS: I don't recall her telling me that.

BY MS. SMITH:

Q. Okay. That's fine.

Do you recall Samantha telling you that -- do you

recall telling Samantha that she needed to put 206 in this annual update because that was the number the county needed to report in order to meet program targets?

A. No, there are no program targets for FSP.

Q. There have never been any targets for the full service partnership program?

A. Not that I recall. That is not how the program is structured.

Q. You don't recall telling Samantha that the number 206 reflects the total program capacity rather than its active enrollment?

A. No.

Q. Do you recall telling Samantha that she wrote the annual update from a deficit perspective?

A. I don't understand what that means, so no.

Q. Okay.

That phrase deficit perspective is not something you are familiar with?

A. I'm familiar with the phrase, but not in this context.

Q. Would reporting an inaccurate number of clients be a problem in your mind?

A. Yes, that would always be a problem.

Q. Why is that?

A. Because we're beholden to the public and to the

Department of Health Care Services to be accurate in our reporting.

Q. If the county reported an inaccurate number of the clients that it served, could that jeopardize the county's funding?

MR. JACKSON: Incomplete hypothetical, vague, calls for a legal conclusion.

BY MS. SMITH:

Q. Did you understand my question?

A. I did.

I think it depends on the circumstance, right, I would need a very specific example.

Q. Do you feel that the difference between 206 clients versus 106 clients would be a mistake that would be a problem for the county's funding on this particular program?

A. Again, I would need more detail, right? I mean, probably not, but it would need to be more specific. You need to be more specific.

Q. With respect to the full serve partnership program is there a time frame in which services to clients have to be reported within the county's system?

A. The county policy is that people -- that providers submit notes within three days. It has changed. It used to be five days. Three days and

clients are identified in this county, you know, for the purposes of billing, as FSP or non FSP clients, and you might be getting too much in the weeds for me because I don't do direct service anymore.

Q. Is there a time frame for reporting outcome data as far as fiscal service partnership clients who receive services from the county?

A. It is recorded on the annual updates and then in the three-year plan.

Q. And is there a 90-day time frame that you are aware of that after these outcomes are achieved, the county has about 90 days to report those outcomes within its own record-keeping?

A. I believe you may be referring to within the DCR, but I don't know that system. But I am not familiar with any other reporting requirements within the 90-day period. It possible I don't know the DCA.

Q. What is the DCR?

A. Data reporting -- data something. Data something reporting.

Q. Is it a state portal that you would go to to look up information, or someone would go to look up information?

A. I suppose it could be used that way. It is a portal that our providers are supposed to be inputting

12:47 data into.
12:47 Q. What kind of information do the county's
12:47 providers put into the DCR portal?
12:47 A. Again, I have limited information. So it is
12:47 the portal that was developed to track outcome for full
12:47 service partnerships.
12:47 The things I can say with certainty is that the
12:47 providers are supposed to establish when someone -- when
12:47 there is a determination made by the clinical -- by the
12:47 clinician that someone meets eligibility criteria for
12:47 full service partnership, they are supposed to enter that
12:47 person into the DCR. And then when there are key events
12:47 in that person's life, such as they're incarcerated, or
12:48 they have an acute hospitalization, that data is also
12:48 entered in that.
12:48 Q. When Samantha was the mental health services
12:48 act coordinator, did she train county employees on how to
12:48 do the reporting?
12:48 MR. JACKSON: Objection, vague.
12:48 THE WITNESS: To my knowledge not the
12:48 reporting. The data entry, yes. That's my
12:48 understanding.
12:48 BY MS. SMITH:
12:48 Q. Going back to the 206 number that you were
12:48 looking at, at the top of page 17, do you recall Samantha

telling you that she reviewed the numbers provided by the fiscal department and that the 206 number was inaccurate?

A. No.

Q. In terms of funding, how much additional funding does Siskiyou County receive if not the number reported was 206 but the actual clients served was 106?

Do you have an estimate of that?

A. Zero.

Q. Why is that?

A. Because the amount of funding we receive is not based on the number of FSPs. It is a calculation, but it does not include the number of FSPs in our program.

Q. What is that calculation based on not the number of clients served?

A. You're going beyond my knowledge, but I can tell you generally.

Q. Okay.

A. It is some -- it is, right, I told you it is a tax on millionaires. It is a 1 percent tax on millionaires. So in part it is determined by how much taxes, how much tax is paid any given year and then the true-up a couple of years later also plays into how much we receive.

I do believe that there is -- that the number of Medi-Cal beneficiaries in a county plays into that

12:50 calculation, but it is very complex and I don't know the
12:50 other pieces. But I am close to certain that it is --
12:50 has nothing to do with the number of FSP's in the
12:50 program.
12:50 Q. Okay, thank you.
12:50 MS. SMITH: Let's break for lunch now.
12:50 THE VIDEOGRAPHER: That concludes video session
12:50 number 3 in the deposition of Sarah Collard. The time
12:50 the 12:20, and we are off the record.
01:57 (Lunch recess.)
01:57 THE VIDEOGRAPHER: This is the beginning of
01:57 video session number 4 in the deposition of Sarah
01:57 Collard. The time is 1:57, and we are on the record.
01:57 MS. SMITH:
01:57 I'm going to hand the witness a three-page document
01:57 that we'll mark as Exhibit 81.
01:58 (Exhibit 81 marked.)
01:58 BY MS. SMITH:
01:58 Q. Are you ready?
01:58 A. I am.
01:58 Q. Do you recognize Exhibit 81?
01:58 A. Yes.
01:58 Q. Is it your job description for the director of
01:58 health and human services agency?
01:58 A. I believe it is.

01:58 Q. And is Exhibit 81 a true and correct copy of your job description as the director of health and human services agency?
01:58 A. Yes.
01:58 Q. Is there anything about your job description that you think is wrong or inaccurate?
01:59 A. The HHSA director no longer oversees the director of emergency services.
01:59 Q. What paragraph are you on?
01:59 A. Under classification supervised.
01:59 Q. Oh.
01:59 Anything else that you would say is wrong or inaccurate?
01:59 A. The public health officer now reports to the director of public health.
01:59 Q. Anything else that you see that is inaccurate? Take your time. Don't rush.
02:00 A. Social services no longer uses the merit system. I'm actually not certain that that is what it refers to here. So it is, like the fifth or sixth sentence down the second page that says agency staff -- personnel rules, merit system.
02:00 If that is referring to the merit system in social services, we no longer are in the merit system.
02:00 Q. When did social services employees stop being

subject to the merit system?
A. I don't recall specifically.
Q. So do you have an estimate or no?
A. I believe it was shortly before I came into the position, but it might have -- that process might have concluded after. I don't -- I mean, that is just an estimate.
Q. No problem.
Is there anything else that seems inaccurate?
A. The rest of it looks accurate.
Q. Going back to the very first page of Exhibit 81, which is Collard 002966, do you see in the fifth line down that this job description says that you are responsible for fiscal management?
A. Yes.
Q. Does that have any specific meaning to you as far as what you do on a day-to-day basis?
A. I interact with the fiscal teams and direct some of their work, and I'm involved in the budget process obviously.
Q. Anything else that you feel falls under responsible for fiscal management as it relates to your work?
A. Well, ultimately I'm responsible for all of it, right? Am I involved in all of it on a daily basis, no.

Each division has a fiscal team and divisions report to the director of public health and the director of public services reports to me.

So I am ultimately responsible for those decisions that are made, and all of that, but in my day-to-day work, I'm not down in the weeds of fiscal.

Q. When you discussed overseeing or directing a fiscal team, who is that team that you have in your mind?

A. It depends on the department. So there is a program manager in public health that I work with, but Shelly Davis, the director of public health, directs their work.

There is a -- he's a deputy in social services, he reports to Trish Barbieri, who is the director of social services.

And behavioral health is structured a little bit differently because I'm both the behavioral health director and the agency director, so I work directly with the fiscal lead and the behavioral health department.

Q. Is that Rose?

A. No, Rose retired. It is Develyn Sippel.

Q. Can you spell that?

A. D-E-V-E-L-Y-N , S-I-P-P-E-L, I think it is E-L.

Q. Before Develyn Sippel who was the person that you worked with in fiscal?

A. Rose Bullock.
Q. And before Rose Bullock who was the lead at fiscal that you worked with, if anyone?
A. Rose predated me. I believe that she may have become the lead around the same time I became the behavioral health director, but I haven't worked with anyone else. I've worked with other fiscal people, but not other leads.
Q. So the fiscal team in your mind is Develyn Sippel, Shelly Davis, and one other person.
Is that correct?
A. No, the fiscal team --
Shelly Davis is the public health director, and underneath her is Dawn Walton is the fiscal lead for public health.
These are distinct teams. District fiscal teams for each division. Kirk Hendricks is the social services deputy over fiscal, and he reports to Trish Barbieri, who is the social services director, and Trish reports to me, and Shelly to me.
Q. So besides Trish Barbieri, Kirk Hendricks, Don Wilson, and Develyn Sippel, is there anyone else that you think of when you think of your fiscal teams that you direct?
A. Did I directly direct -- those fiscal teams are

comprised of multiple people, right? So I don't directly direct any of those people other than Develyn. But each team has, you know, several people on it.

Q. I see, okay.

When you described being involved in the budget process, can you generally speak of what your job is with respect to the budget process?

A. It is a little bit different in each division. Generally it involves meetings with the key leadership.

Our various associations publish or provide webinars on projections for the coming year, so it is sort of working through each budget line item and determining what we're going to budget for next year.

It is, you know, talking through positions, and each division has multiple budgets, right, because of the way, yeah -- so all of that gets compiled, it goes to the county administrators's office, it gets reviewed.

Different years they've asked for budget hearings for the departments, so I attend those with our fiscal employees, and Trish or Shelly, and then it goes to the the board. So I attend that meeting. Then that is the recommended budget. Typically in June it goes to the board.

Then there is a lot that is unknown at that point, and so we revisit those budgets, go through a similar

process again, refine them, and then there is a final, you know, an adopted budget that typically goes to the board in September for approval.

There is a mid-year budget review, which is also just where are we.

Q. Do you recall if Samantha ever presented a budget to the board when she was the mental health services act coordinator?

A. She would not have presented a budget. I believe that she attended the board meeting with me for the year she worked on the annual update.

The budget for MHS -- there is a standalone county budget for MHSA, and it is the plan that is required to have the budget incorporated into the plan or the updates, and so that was part of the presentation.

I don't recall a single time that the board has ever asked a question about the budget in the presentation regarding the annual update or the three-year plan. It is possible they have, but I don't recall that ever happening.

Q. You don't recall Samantha making any presentation to the board about the mental health services act.

Is that correct?

A. Specifically about the budget, I don't recall

that.

Q. If you could flip to page 2, which is Collard 002967, do you see about nine lines down, there is a reference to direct gathering as to statistical information and the preparation of a variety of agency reports.

Do you see that?

A. I do.

Q. And can you tell me how that particular job duty is reflected in your day-to-day activities, if it is?

A. I think at various times, in different ways, we're audited all of the time, and so I am often part of the process of collecting information for audits.

We're currently working on this iteration of the -- it's the name has been changed to the behavioral health services act, so the BHSA plan. So I work with staff to gather data to report out as part of that plan.

We report out on so many different things, so I chat with staff about care court data, and LPS data, and the hospitalization data, and the data that is coming out of our electronic health record, and -- there is just an endless amount of data that we're responsible for. So I have different types of conversations with different staff about that data.

Q. Are those conversations about how to generate the reports, or how to report different figures, or is it a different kind of conversation that you have?

A. It depends on the data. So I personally don't pull data from our electronic health record. I have a very strong data person that does that. So at times her explaining to me how did we get here, right, so it just depends.

Q. Is that Tara Ames that you are thinking of?

A. No.

Q. Who is the person that does your data --

A. -- currently?

Q. Yes.

A. Laura Sutcliffe.

Q. Can you spell that?

A. L-A-U-R-A, S-U-T-C-L-I-F-F-E.

Q. Has Laura Sutcliffe always been the person helping you with the data-gathering, or was there someone before Laura that helped you with that process?

A. So Tara Ames was prior to her. We had an extra help employee, Ashley, she might be on here. Ashley Dike was extra help.

Prior to that that position didn't exist. Well, and also, right, fiscal pulls fiscal data for me. So it just depends on the kind of data. IT sometimes pulls -- our

IT team sometimes pulls data for us in the behavioral health division.

Now, I'm assuming you don't want me to go into all the other stuff.

Q. No, you've been very specific. I appreciate it.

A. Okay.

Q. Was one of your job duties to oversee the behavioral health services funds budget, or is one of your job duties to oversee the behavioral health budget?

A. Yes, it is my responsibility to oversee every budget we have, right, so in that sense, yes.

Q. Including the rest?

A. Including the rest.

Q. Do you know if the county is re-paying the state money following a prior audit of the behavioral health program?

MR. JACKSON: Vague and overbroad.

MS. SMITH:

Q. Do you understand my question?

A. I do.

Are you asking specifically about MHSA?

Q. Yes.

A. To my knowledge, no. Well, to my knowledge no. In MHSA we're not re-paying any funds.

Q. And behavioral health at large, is the county re-paying the state money for behavioral health at large?

MR. JACKSON: Same objections.

THE WITNESS: So I have two responses to that.

One, in the Medi-Cal program in behavioral health, we are audited on a tri-annual basis. Well, there is a -- there is a fiscal audit for each year, and at times there are discrepancies found, so there is a true-up, right, because we go back and forth with the state.

As part of the Medi-Cal audit, it used to be true that they would audit notes, right, billing notes, and if they disallowed a note, we were required to pay, you know, to true up that difference.

Those things have gone back and forth over the years. I remember not a year ago I think they paid us something like $100,000. I can't remember the amount.

Prior to my time, the previous director, there were some issues that I understand sort of in a global sense but not specifically because it was prior to my time, the county -- the county -- the person in charge at that time didn't understand how behavioral health funding worked, and the state disallowed a lot of notes.

So there was a significant pay-back. It think it was originally -- it was originally, I think,

$11,000,000, there was some more tacked on in final so we pay that back at $200,000 a year, but that predates my time in leadership.

Q. So this is something that occurred between 2006 and 2010, this discovery of the state wanting the county to pay back roughly 11,000,000 or so, would you say that is accurate?

A. I don't think the years are accurate, because I came into leadership partly as a result of that finding, right? So I started in leadership in 2013.

I know there was, I think, 1.9 million dollars of that pay-back that was resolved after I got there that pertained to the time preceding my time in leadership.

Q. Okay.

Is it correct that the mental health services act funds for specific programs can't be re-directed to other purposes without the Department of Health --

A. -- Care Services.

Q. Health Care Services authorization and a planned amendment.

Is that true?

A. That is correct.

With the caveat that if it is the in original plan, you don't need to ask twice, right?

Q. Are you familiar with the phrase backfill

mental health as it relates to the way positions are opened or created in behavioral health services?

A. I am familiar with that term. It is not a term we use because it is illegal to sort of supplant, right, if you are paying for a position out of behavioral health you can't supplant, yeah.

Q. So to your knowledge, you haven't used the phrase backfill mental health when you discuss with your staff how positions are created or allocated?

A. It is possible that I have slipped and used that phrase, but it is not -- it is a phrase that I try not to use because it is something we're not allowed to do.

Q. Does the term refer to using funds for one program, like the work force education and training funds, for a different program.

Is that what this backfill mental health term suggests?

MR. JACKSON: Calls for a legal conclusion, it's vague.

THE WITNESS: That in my mind is not an appropriate -- that is not how that phrase is used, right?

So originally when the mental health services act came into being in 2006 or 2004, depending on how long

you measure, there was funding allocated to each of the five buckets, right? So PEI, community services and supports, workforce education and training, capital facilities, and what is the one I'm missing? I'm missing one.

So there was a specific -- whatever it was -- there was a specific amount of funding that was allocated on a percentage basis. At some point this changed. And so it was at the discretion of the counties to allocate, to take some of the money out of the bucket for CSC and allocate it -- up to 20 percent could be allocated out of community services and supports into WET and CFTN, which is capital facilities and development.

So we elected to do that, so in that sense, I wouldn't use -- I don't recall ever using the term backfill because there was nothing to backfill, right? That is the only fund, I mean, that it is not the only fund that we used to, you know, cover those types of expenses, but --

Q. Okay.

A. -- but for the things that we paid for out of WET and CFTN, we always paid for those things out of WET and CFTN because one of the ideas behind the mental health services act was that behavioral health was underfunded in these particular ways in addition to

others.

Q. Do you remember ever using the phrase backfill mental health to refer to using available funds in the general behavioral health services fund budget for other purposes?

A. You'd have to be more specific. That is so broad, I have no idea.

Q. Would that be okay to do in your mind?

MR. JACKSON: Incomplete hypothetical, it is vague.

THE WITNESS: You have to repeat the question.

BY MS. SMITH:

Q. Sure.

Would it be okay or acceptable in your mind to cover a shortfall in the general behavioral health services planned fund budget with other funds?

MR. JACKSON: Same objections.

THE WITNESS: I would need a lot more information, right? Would it be -- yeah, I would need a lot more information.

We get a lot of money from a lot of different places and backfill, in a general sense, is not appropriate. But if we received a grant that ended and we still had the need for that service to continue and we had other

funding, right, we had no more funding from this grant. We would look for other money if we still had that service need to cover that, but only if that original funding was not available.

So I would need a lot more information.

Q. No problem. That's fine.

Do you recall ever taking funds from the -- I'm sorry, were you going to say something?

A. No.

Q. Oh, okay.

Do you ever recall taking funds in the WET program to backfill other mental health positions?

A. Like I said, it was at the county's discretion to spend money on WET or not. So it is possible, in any given year, we had a need in CSS, community services and supports, and couldn't allocate -- WET was sort of a -- we had more discretion. You know, it provides things like training, and education, and those types of things,

So if there was a service need that was related to our core services, we would prioritize those because those are mandated services, right? Training for staff, we want staff to have training, we want to be able to support in any way we can, but if we were required to pay mandated services and didn't have enough money to provide training, then we'd provide those mandated serves.

02:25 Q. You said there was a time when the county had a
02:25 little bit more discretion. Do you have a year or a time
02:25 frame in your mind when the county could make decisions
02:25 about where to move funds from one program to another?
02:25 A. I don't remember specifically, but it was true.
02:25 It is true now. It will end in June, at the end of June.
02:26 I don't remember specifically when the county, when the
02:26 Department of Health Care Services said, you know, you
02:26 are not longer required to spend, you know, funds in each
02:26 of the buckets.
02:26 You now are required to do innovation -- that is the
02:26 one I was forgetting because I don't like it --
02:26 innovation, community services and supports and PEI,
02:26 those stayed, you know, we were required to spend funding
02:26 there based on a certain percentage.
02:26 At some point -- I would even hesitate to do an
02:26 estimate.
02:26 Q. Of what year it was acceptable to move
02:26 positions or funding from one program to another program,
02:26 there is not a clear time in your mind?
02:26 A. There is a clear time, but it is not in my
02:26 mind.
02:26 Q. So there is something specific in writing that
02:26 would tell you that time frame?
02:26 A. There is somewhere .

Q. It will end in June of '26?
A. Yes, the county is moving towards the behavioral health plan, and that again has required percentages for each bucket.
Q. Okay.
I'm going to give -- do you need a break?
MS. SMITH: I'm going to share with the witness a 45-page document. We'll mark it as Exhibit 82.
(Exhibit 82 marked.)
BY MS. SMITH:
Q. I'll be asking you about page 7, but feel free to take your time while we do this.
Are you familiar with Exhibit 82?
A. Yes, not in detail, but yes.
Q. Okay.
We're looking at a 45-page document that is for fiscal year 2020 to 2021.
Is that correct, Exhibit 82?
A. 2020 appears to be.
Q. And this is a revenue and expenditure report for fiscal year 2020 to 2021?
A. It is.
Q. Would that particular type of reporting be required under the mental health services act?
A. It is.

Q. Do you sign these types of reports as part of your job duty?
A. I can't tell you off the top of my head. Usually for this particular report, usually there is an attestation. I'm pretty sure that I do, but I can't say with certainty.
Q. Do you certify these revenues and expenditures reports as part of the three-year plan?
A. It is separate reporting on a separate cadence. So this is due in January, the end of January every year, it is a retroactive look, right? And then so -- and the plans they are both prospective and retrospective, right, so they are connected. But by certifying the plan it is a different certification than certifying the ARER, the annual revenue and expenditure report.
Q. Who helps to create this particular annual revenue and expenditure report versus other types of reports, who generates this document?
A. This was a fiscal task.
Q. I'm sorry -- go ahead. Were you going to say anything else?
A. In this particular year, I believe it was either Mimi Pierce or Rose Bullock. There was some back and forth with the program. You will note on this page, for instance, programs are listed, you know, the day

reporting center, communicate outreach, in order for the Department of Health Care Services to tie the revenue back to the program when they audit, all the names need to be specific and accurate, right?

So there is some back and forth with program about which program, which program is this part of, you know, just to make sure that everything is aligned. But in terms of the numbers, completely fiscal.

Q. You're looking at the bottom of page 7, the chart that says section 2 when you refer to programs?

A. Yes.

Under there there is flex funds, one is recovery programs, homeless outreach, veterans outreach, and engagement, so there is some back and forth.

It is more relevant for the prevention and early intervention programs because they are all named. It is a level of weeds you don't probably want me to go into, but they are named but they are different -- how do I explain it?

There are different required components or services that we are required to provide under prevention and early intervention, including stigma reduction, prevention, early intervention, suicide, you know, there are all of these different services we're required to report.

We name our programs, right, so they're specific names given to specific programs that, like first five provides programs for us. So first five provides, and I'm just staying this off the top of my head because I can't remember in each year what they provided.

They provide access to services and prevention services, right, so we have to group -- in the reports we have to group those by the type of service they provide but under their name. So that -- like we have multiple programs that provide, um, access and linkage to care, and we have to cross-reference that in the reports, right?

First five provides it, the family resource centers provide it, the schools provide it, and so there is back and forth with the program around how to accurately document those -- the services we are mandated to provide under the names of the programs that provide them.

So there a quite a bit of back and forth about that in terms of numbers. So does that make sense? It is complicated.

Q. I appreciate you walking me through the process.

So when fiscal generates the revenue and expenditure report, do you take any steps to verify the information, the financial information, or correct it or do anything

reviewing the financial information?

A. It is a very complex report. How they get there is way beyond my scope.

We are audited, right, on this and so that is really the review. I look at it to see if there is anything that stands out, but this data comes from multiple sources. And I don't have the, like I don't track that level of detail.

Q. Do you recall Samantha ever expressing concern to you that the prevention and early intervention numbers couldn't be verified in the annual revenue and expenditure report?

A. I don't recall that specifically, no.

Q. Do you recall any concerns that she bought to you about being unable to track the financial numbers being generated in the annual expenditure and revenue report?

A. I don't recall specifically. I know that tracking is challenging for a variety of reasons. It is possible.

Q. Did she express any concern to you about something called ghost reporting?

A. No, not that I recall. She may have, but I don't recall.

Q. Does that term mean anything to you, in terms

of the way certain fields are reported out or certain services are documented?

A. I don't recall ever hearing that term before. It is possible that I have before, but I don't recall ever hearing that term before. It is not a -- yeah, I don't recall.

Q. If you look to page 7, do you see that the total amount for column A that was spent for the mental health services act fund going to the community services and support program is in excess of 2.5 million?

A. I do see that.

Q. And then if you keep going along the line to column B, do you see zero dollar amount for the Medi-Cal FFP column?

A. I do.

Q. Can you tell me what FFP stands for?

A. Federal financial participation.

Q. And are federal financial participation funds matched from the government for each dollar that the county spends on eligibility services?

MR. JACKSON: Lacks foundation.

BY MS. SMITH:

Q. Did you understand my question?

A. FFP is the federal match for Medi-Cal services.

Q. So this particular page, page 7, reflects that

there was zero dollars matched from Medi-Cal for the community services and supports programs.

Is that accurate?

A. That is what that says. I am not sure how Rose tracked that. Some of these things -- so for FFP programs there would be a match. I'm not sure why it is not reflected on this form, but we use that money, you know, to pull -- we used MHSA as a match for the FFP.

For some of those things, like flex funds, wellness recovery and programs, there is no match. So it depends on which service.

Q. Do you feel that the zero dollar amount in column B is incorrect with respect to the community services and supports funding?

MR. JACKSON: Lacks foundation, calls for speculation.

BY MS. SMITH:

Q. Did you understand my question?

A. I did.

What I know is we've been audited and there were no findings. So I'm not sure how she was reporting it, as I said, because that is not, yeah --

Q. Okay.

So even if it looks strange to have a zero, you're saying the auditors did not cite this particular --

A. -- they have not cited anything.
Q. Okay, that's fine.
MS. SMITH: I'm going to go to Exhibit 83?
THE COURT REPORTER: 83.
(Exhibit 83 marked.)
BY MS. SMITH: This is 39 pages.
Q. Is Exhibit 83 a copy of the annual revenue and expenditure report for fiscal year 2021 to 2022?
A. It appears to be.
Q. Would you ever certify this 39-page document for fiscal year 2021 to 2022 as part of your job duties?
A. Again, I believe there was a separate certification page, but I can't be certain.
Q. Do you think that Exhibit 83 is a correct copy of the annual revenue and expenditure report for the mental health services act program during fiscal year 2021 to 2022.
Take your time. Don't rush.
MR. JACKSON: She's not just asking about the page you're looking at.
THE WITNESS: I mean, I can tell how you it looks, but unless I went through all of these worksheets of which there are many.
MR. JACKSON: Tell her.
BY MS. SMITH:

Q. If you can't tell me, that's okay, too.
A. It appears accurate. But again, like you saw the number of worksheets, I will tell you I've never reviewed all of Rose's worksheets in this level of detail. We have a consultant that does that.
Q. Who is the consultant that would review the annual revenue and expenditure account in detail?
A. He helps us with cost reporting, and that is part of this processing. His name is -- I always get him -- Gary Earnst.
Q. Is that a county employee or a contractor?
A. He's a contractor.
Q. Can you spell his name?
A. E-A-R-N-S-T.
Q. How long has Mr. Earnst been reviewing the annual revenue and expenditure reports for the county?
A. Again, he is our fiscal consultant. He helps primarily with the cost report but on the Medi-Cal side, but there is an interplay there, right. So I don't know if he looks at this at the same level. He predates me.
Well, does he? When we had the issue we discussed earlier with the payback, that might have been when the county -- I'm not sure. It is a long time.
Q. He might have come on as a consultant around the time the county realized it needed to repay back that

11 million roughly figure?
A. He may have. I'm not certain.
Q. If you could turn to page 8, looking at column A, would you agree that this annual revenue and expenditure report reflects that there was in excess of 2.5 million dollars spent on community services and support program?
A. Yes.
Q. And if you move over to column B, do you see that there is zero dollars under the Medi-Cal FFP column?
A. Yes.
Q. Does that indicate that the county didn't have any matching Medi-Cal funds for fiscal year 2021 to 2022 for its community services and supports program?
MR. JACKSON: Calls for speculation, lacks foundation.
THE WITNESS: Like I said, I'm not in the weeds on these reports, so I am no sure how Rose reported that out. But again, I believe this has also been audited and there has been no findings.
BY MS. SMITH:
Q. So to you that is not a concern, is that correct?
A. Given that on -- yeah, given that we've been audited and there have been no concerns.

02:44 1 MS. SMITH: I'm going to give Ms. Collard a
02:45 2 39-page document that I will mark as Exhibit 84.
02:45 3 (Exhibit 84 marked.)
02:45 4 BY MS. SMITH: We're going to be looking at
02:45 5 page 7, again.
02:45 6 Q. Are you ready?
02:45 7 A. I am.
02:45 8 Q. Okay.
02:45 9 And is Exhibit 84 the annual revenue and expenditure
02:45 10 report for fiscal years 2022 to 2023?
02:45 11 A. It appears to be.
02:45 12 Q. Even if though is there no attestation, would
02:45 13 you have certified this document as part of your job
02:46 14 duties?
02:46 15 A. Again, I am not certain that I actually put my
02:46 16 signature on it, but I am responsible for it.
02:46 17 Q. And when you say that you have this oversight
02:46 18 responsibility, is it just a more general responsibility
02:46 19 with the consultants or other fiscal folks doing the more
02:46 20 detailed work on this particular report?
02:46 21 A. Absolutely, they do all of the detailed work on
02:46 22 this report.
02:46 23 Q. Do you recall any time that you went to the
02:46 24 fiscal or to the consultant to discuss with them any
02:46 25 concerns about the numbers being reported on the annual

revenue and expenditure report?

MR. JACKSON: Vague and overbroad as to time and scope.

THE WITNESS: I have multiple conversations with fiscal. I don't remember specifically concerns.

BY MS. SMITH:

Q. So there have been times you've discussed things with them related to the revenue and expenditure report, but nothing specific comes to mind at this moment?

A. Yes.

Q. If we could turn to page 8. Sorry, page 7. I apologize.

Is it correct that this particular report indicates that in fiscal year 2022 to 2023, the county spent over 2.3 million dollars in the mental health services act funds for its community services and supports program?

A. That is accurate.

Q. And if we move over to column B under the Medi-Cal FFP column, do you see a number that is in excess of $842,000 dollars in column B?

A. I do.

Q. And do you know why this particular fiscal -- I apologize.

Do you know why this particular revenue and

expenditure report has such a big figure in column B when the last two fiscal years had zeros for that particular column?

A. I don't. You would have to talk to Rose or Mimi. I'm not sure.

Q. Would that be a concern for you?

MR. JACKSON: Calls for speculation, vague.

THE WITNESS: If change is concerning. But again, we're audited every year and there have been no findings. So would I have -- I'm not sure what happens in the interim, right? There is a true-up, so I don't know if this was flagged as -- I don't know if it was reported a different way and it was flagged at some point, and the fiscal team was asked to report it differently.

I'm not certain. I don't remember a conversation about that.

Q. That's fine. I appreciate you looking at these particular documents.

MS. SMITH: If I could just have a break to review all my exhibits to make sure that I've asked you everything that I have to ask you?

THE WITNESS: Sure.

THE VIDEOGRAPHER: All right. This concludes video session number 4 in the deposition of Sarah

Collard. The time is 2:49, and we are off the record.

(Recess taken.)

THE VIDEOGRAPHER: This begins video session number 5 in the deposition of Sarah Collard. The time is 2:58, and we are on the record.

MS. SMITH: I'm going give Ms. Collard a two-page document that I'll mark as 85.

(Exhibit 85 marked.)

BY MS. SMITH:

Q. Do you recognize Exhibit 85?

A. I do.

Q. Is it a thread of emails that you received on May 16th and 17th, 2023?

A. Yes.

Q. Is Exhibit 85 a true and correct copy of emails you sent and received in May of 2023?

A. I believe so.

Q. Looking at your question to Rose Bullock and others on May 17th, 2023, can you tell me in regular words what they are asking Rose for information about?

A. So the California mental services authority and -- was creating some new work for development programs, which are listed here.

Like I said earlier, counties at this point were allowed to move up to 20 percent of the money in

community services and supports into work-force education and training, or CFTN. We always called it CFTN, but I think it is capital funding -- I don't know. Capital funding and technology, right, so we could move a portion also to support, and we've used that funding historically to support our electronic health record.

So, as I have said, we always want to give our staff opportunities for advancement. So I was asking Rose, you know, what is the -- what have you budgeted, in general, and what is 20 percent of that, minus what we are using for CFTN that can we can dedicate towards these programs because I was wanting to determine which programs we could make available to our staff.

Q. So in your mind, that would be acceptable so long as it was below the 20 percent mark. Is that accurate, this transferring of funds from one program to another?

A. As long as what we were transferring out of community services and supports did not exceed 20 percent.

Q. Are you aware of any times that transfers out of the community services and supports funds exceeded 20 percent?

A. I'm not aware of, no.

Q. And you don't recall any concerns that Samantha

raised with you with respect to how money was being transferred from one program to another.

Is that correct?

A. I don't recall any of those conversations, no.

Q. I'm going to give the witness a five-page document. That is 86.

(Exhibit 86 marked.)

BY MS. SMITH:

Q. Do you recognize Exhibit 86?

A. I do.

Q. Is Exhibit 86 a true and correct copy of your training certificates or training sign-ins as they relate to preventing harassment?

A. I believe so. Like I said, 2011 is a long -- well, a long time ago. I don't remember specifically, but I'm assuming they are accurate.

Q. Has your training covered preventing retaliation, as well as preventing harassment?

MR. JACKSON: Asked and answered at the beginning.

THE WITNESS: Retaliation was included in those trainings, yes.

BY MS. SMITH:

Q. And has your training also covered preventing discrimination, in addition to preventing harassment?

A. Yes, I believe that was part of -- I can't say specifically for each training because who knows what happened in 2011, but I'm assuming so.

Q. Did did you have any training with respect to preventing harassment or discrimination between 2020 and 2025?

A. I attended all -- I would have to go back. I attended all of the trainings that the county assigned.

MR. JACKSON: I object to Exhibit 86; speaks for itself because it is dated.

BY MS. SMITH:

Q. What I see is there is a jump in time from May 2020 to May 2025. So I'm just wondering if you have a memory of some kind of anti-harassment training that you attended between 2020 and 2025?

A. I don't have a specific memory, but what I will tell you is there is other kinds of random trainings I attend. It is possible I attended some on our learning platform, which is Relias. I don't recall, but I didn't check. So I can check on that and provide any of those to you.

Q. So I received a large amount of documents from the county that you searched for and provided, I but I haven't had time to look carefully through. But I believe I'm done for today with my questions, and I'm

hoping there is not any reason for coming back here and asking you about documents, but I don't really think that is going to happen.

But for today, I'm done asking you questions and I appreciate your patience with me.

THE WITNESS: Of course.

MR. JACKSON: We're not agreeing to re-produce her.

THE VIDEOGRAPHER: Any questions, Nathan?

MR. JACKSON: No.

THE VIDEOGRAPHER: If we we could get the transcript orders?

MR. JACKSON: Yes.

MS. SMITH: Yes, definitely.

THE VIDEOGRAPHER: Tanya, do you want synchronization?

MS. SMITH: Yes, but maybe wait until I check with my manager.

THE VIDEOGRAPHER: You can tell me tomorrow. Nathan, synchronized?

MR. JACKSON: Yes.

THE VIDEOGRAPHER: All right. That ends the deposition of Sarah Collard. The time is 3:06, and we are off the record.

(Deposition concluded at 3:06 p.m.)

PENALTY OF PERJURY

Please be advised I have read the foregoing deposition, and I hereby state there are:

(Check one) _____ no corrections

_____ corrections attached

Executed on _____

DATE

_____

SARAH COLLARD

---oOo---

DEPOSITION OFFICER'S CERTIFICATE

STATE OF CALIFORNIA)
) ss.
COUNTY OF SISKIYOU)

I, Caroline F. Cansino, hereby certify:

I am a duly qualified Certified Shorthand Reporter, in the State of California, holder of Certificate Number CSR 10488 issued by the Court Reporters Board of California and which is in full force and effect. (Bus. & Prof. 8016)

I am not financially interested in this action and am not a relative or employee of any attorney of the parties, or of any of the parties. (Civ. Proc. 2025.320(a))

I am authorized to administer oaths or affirmations pursuant to California Code of Civil Procedure, Section 2093(b) and prior to being examined, the deponent was first placed under oath or affirmation by me. (Civ. Proc. 2025.320, 2025.540(a))

I am the deposition officer that stenographically recorded the testimony in the foregoing deposition and the foregoing transcript is a true record of the testimony given. (Civ. Proc. 2025.540(a))

I have not, and shall not, offer or provide any services or products to any party's attorney or third party who is financing all or part of the action without first offering same to all parties or their attorneys attending the deposition and making same available at the same time to all parties or their attorneys. (Civ. Proc. 2025.320(b))

I shall not provide any service or product consisting of the deposition officer's notations or comments regarding the demeanor of any witness, attorney, or party present at the deposition to any party or any party's attorney or third party who is financing all or part of the action, nor shall I collect any personal identifying information about the witness as a service or product to be provided to any party or third party who is financing all or part of the action. (Civ. Proc. 2025.320(c))

Dated: March 16, 2026

Caroline F. Cansino

DEPOSITION OFFICER'S CERTIFICATE

(Civ. Proc. 2025.520(e))

STATE OF CALIFORNIA)
) Ss.
COUNTY OF SISKIYOU)

I, Caroline F. Cansino, hereby certify:

I am the deposition officer that stenographically recorded the testimony in the foregoing deposition.

Written notice pursuant to Code of Civil Procedure, Section 2025.520(A), having been sent, the deponent took the following action within the allotted period with respect to the transcript of the deposition:

( ) In person, at the office of the deposition officer, made the changes set forth on the original of the transcript. (The parties attending the deposition have been notified of said changes.)

( ) Approved the transcript by signing it.

( ) Refused to approve the transcript by not signing it.

( ) By means of a signed letter, made the changes and approved or refused to approve the transcript as set forth therein. (Said letter has been attached to the original transcript and copies thereof mailed to all parties attending the deposition.)

( ) Failed to approve the transcript within the allotted time period.

Dated_____.

_____

DEPONENT'S CHANGES OR CORRECTIONS

Note: If you are adding to your testimony, print the exact words you want to add. If you are deleting from your testimony, print the exact words you want to delete. Specify with "Add" or "Delete" before each entry. Please sign and date this form.

Deposition of: SARAH COLLARD
Name of Case: S. SCHLIETER vs. SISKIYOU CO., et al.
Date of Deposition: Monday, March 2, 2026

I, _____, have made the following changes in my deposition:

PAGE	LINE	ADD/DELETE
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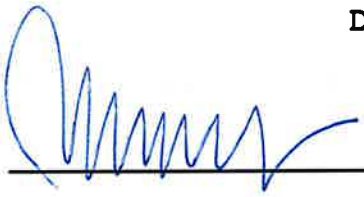

SARAH COLLARD

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13	5	delete HIPAA, add Behavioral Health
13	7	delete ASOC, add CSOC
24	1	delete Supervision, add systems
~~25~~	6	delete Chris, add Kris
58	24	delete MHSA, add MHSSA
59	2	Mental Health Student Services Act
~~59~~	~~11~~	delete are, ~~add a~~
~~92~~	7	~~to~~ delete Jennifer Taylor, add Jennie
92	9/10	delet Tammy Wrightmyer, add Ebajer
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110	21/22	delete Don Wilson, add Dawn Walton
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110	24	delete Dike, add Dyke
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